



January 19, 2016

Master Lock Company LLC
c/o Corporation Service Company
2711 Centerville Rd., Suite 400
Wilmington, DE 19808

Master Lock Company LLC
Attn: Legal Department
137 W. Forest Hill Ave.
Oak Creek, WI 53154

Target Corporation
c/o CT Corporation System
818 West Seventh St., Ste 930
Los Angeles, CA 90017

Re: NOTICE OF VIOLATION AGAINST MASTER LOCK COMPANY LLC AND TARGET CORPORATION OF CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.6

To Whom It May Concern and to Public Prosecutors:

Ecological Alliance, LLC, a California limited liability company ("Alliance") is a California company acting in the interest of the general public seeking to further, among other causes, the protection of the environment, toxics reduction, the promotion and improvement of human health, the improvement of workers and consumer rights, environmental education and corporate accountability. As described below, Alliance has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65" or "Act"), codified at Cal. Health & Safety Code §25249.5 *et seq.* by Master Lock Company LLC and Target Corporation (collectively the "Violators"). This letter serves to provide Alliance's notification of these violations to the Violators and elected prosecutors. Pursuant to §25249.7(d) of the statute, Alliance intends to bring an enforcement action sixty (60) days or more after effective service of this notice unless the appropriate public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

The products which are causing an exposure without a warning in violation of Proposition 65, are Lock Sets with Brass Keys, including but not limited to UPC # 071649320705 ("Products") manufactured/distributed by Master Lock Company LLC. and offered for sale by Target Corporation to California consumers.

A copy of the Proposition 65 summary prepared by the Office of Environmental Health Hazard Assessment is attached, to the copy of this letter served to the Violators.

Because of this lack of a warning, consumers were exposed to the following chemicals without the proper required Proposition 65 warnings: 1) Lead. The routes of exposure for this chemical are ingestion and dermal. Such exposure can cause birth defects and other reproductive harm. Exposures to the listed chemical from the use of the Products have been occurring without the clear and reasonable warnings required by Proposition 65, dating as far back as January 19, 2015, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is removed from the Products. 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 listed chemical from reasonable foreseeable use of the Products.

Alliance intends to file a private enforcement action as provided for in the Act for the alleged violations by the Violators, unless Violators agree in an enforceable written instrument to: (1) recall the listed products so as to eliminate further exposures to the identified chemicals; or (2) affix clear and reasonable Proposition 65 warning labels for products sold in the future or reformulate such products to eliminate the exposures; and (3) pay an appropriate civil penalty.

Consistent with the public interest goals of Proposition 65, Alliance is interested in seeking a constructive resolution to this matter, and invites Violators, should they seek early resolution of this matter, to communicate directly with Alliance's attorneys. Such resolution will avoid further unwarned consumer exposures, as well as resource intensive litigation.

Please direct all questions concerning this notice to Alliance's attorney, Vineet Dubey (dubey@cd-lawyers.com), Custodio & Dubey LLP, 448 S. Hill St., Suite 850, Los Angeles, CA 90013, 213-785-2909.

Sincerely,



Vineet Dubey
Custodio & Dubey LLP

cc: see attached distribution list

Attachments:
Proposition 65 summary
Certificate of Merit
Certificate of Service

CERTIFICATE OF MERIT
Health and Safety Code Section 25249.7(d)

**Re: Ecological Alliance, LLC's Notice of Proposition 65 Violations by Master Lock Company
LLC and Target Corporation.**

I, Vineet Dubey, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties 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 party.
3. I have consulted with one or more persons with relevant and appropriate experience and have assembled evidence attached to the copy for the California Attorney General as Exhibit 1 to this Certificate of Merit regarding the lack of warnings for the listed chemical that is the subject of the notice.
4. Based on the information obtained 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 plaintiff's case can be established and that 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 California Health & Safety Code §25249.7(h)(2).

Dated: January 19, 2016



Vineet Dubey, Attorney at Law

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this case. I am a resident of or employed in the county where the mailing occurred. My business address is 448 S. Hill St., Ste 850, Los Angeles, CA 90013.

On the date shown below, I served the following:

- 1) 60-Day Notice of Intent to Sue Under Health and Safety Code section 25249.6
- 2) Certificate of Merit; Health and Safety Code Section 25249.7(d)
- 3) Certificate of Merit (Attorney General Copy); Factual information sufficient to establish the basis of the certificate of merit (*only sent to Attorney General*)
- 4) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65); A Summary

on the alleged violator listed below via First Class Certified Mail through the United States Postal Service by placing a true and correct copy in a sealed envelope, addressed to the entity listed below and providing such envelope to a United States Postal Service Representative:

Master Lock Company LLC
c/o Corporation Service Company
2711 Centerville Rd., Suite 400
Wilmington, DE 19808

Master Lock Company LLC
Attn: Legal Department
137 W. Forest Hill Ave.
Oak Creek, WI 53154

Target Corporation
c/o CT Corporation System
818 West Seventh St., Ste 930
Los Angeles, CA 90017

as well as providing copies of the notice to the public enforcers by placing a true and correct copy in a sealed envelope, addressed to the parties listed on the attached Distribution List.

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

January 19, 2016



Vineet Dubey

Distribution List

Alameda County District Attorney 1225 Fallon St, Room 900 Oakland, CA 94612	Los Angeles County District Attorney 210 W Temple St, 18th Floor Los Angeles, CA 90012	Mono County District Attorney PO Box 617 Bridgeport, CA 93517
Alpine County District Attorney PO Box 248 Marysville, CA 95956	Madera County District Attorney 209 W Madera, CA 93697	San Joaquin County District Attorney PO Box 990 Stockton, CA 95204
Amador County District Attorney 708 Marysville, CA 95956	Mariposa County District Attorney P.O. Box 730 Mariposa, CA 95335	San Francisco County District Attorney 850 Bryant St., Rm 322 San Francisco, CA 94102
Butte County District Attorney 25 County Center Dr. Weed, CA 96094	Marin County District Attorney Marin, CA 94923	San Diego County San Diego, CA
Calaveras County District Attorney 891 Mountain Ranch Road San Andreas, CA 95246	Mendocino County District Attorney P.O. Box 1000 Ukiah Ukiah, CA 95568	San Bernardino County District Attorney 316 N Mountain View Ave San Bernardino, CA 92401
Office of the Attorney General P.O. Box 70550 Sacramento, CA 95832	Los Angeles City Attorney 200 N Los Angeles, CA 90012	San Francisco City Attorney # 1 Dr. Carlton B. Goodlett Place, Suite 234 San Francisco, CA 94102
Colusa County District Attorney Courthouse, 547 Colusa, CA 95619	Inyo County District Attorney P.O. Drawer D Independence, CA Independence, CA 94920	Placer County District Attorney 10810 Justice Center Placer, CA 95662
Contra Costa County District Attorney 725 Contra Costa, CA 94590	Orange County District Attorney PO Orange, CA 92668	Merced County District Attorney Merced, CA 95354
Del Norte County District Attorney 450 H St. Crescent City, CA 95531	Nevada County District Attorney 10075 Levon Ave. Nevada, CA 95959	Napa County District Attorney PO Box 720 Napa, CA 94558
El Dorado County District Attorney 515 El Dorado, CA 95757	Plumas County District Attorney 520 Main Plumas, CA 95662	Riverside County District Attorney 3960 Orange Street, Riverside, CA 92503
Fresno County District Attorney 2220 Fresno, CA 93721	Sacramento County District Attorney 901 G Sacramento, CA 95811	San Benito County District Attorney 419 4th St San Benito, CA 95050
Glenn County District Attorney PO Box 430 Willows, CA 95988	San Luis Obispo County District Attorney County Government Center, Rm 450 San Luis Obispo, CA 93426	Siskiyou County District Attorney PO Box 986 Eureka, CA 95501
Humboldt County District Attorney 825 5th St., 4th Eureka, CA 95501	San Mateo County District Attorney 400 County Center San Mateo, CA 94401	Solano County District Attorney 600 Solano, CA 95688
Imperial County District Attorney 939 W. Main St., 2nd Imperial, CA 92543	Santa Barbara County District Attorney 1112 Santa Barbara St. Santa Barbara, CA 93101	Sonoma County District Attorney 600 Administration Dr. Sonoma, CA 94960
Kern County District Attorney 1215 Kern, CA 93204	Santa Clara County District Attorney 70 W San Jose, CA 95128	Shasta County District Attorney Shasta, CA 96087
Kings County District Attorney Kings, CA 95686	Santa Cruz County District Attorney Santa Cruz, CA 95062	Sierra County District Attorney PO Box 457 Sierra Vista, CA 95957
Lake County District Attorney 255 N Forbes St Lakeview, CA 95942	Stanislaus County District Attorney PO Box 442 Stanislaus, CA 95204	Trinity County District Attorney PO Box 310 Weaverville, CA 96093
Madoc County District Attorney 204 S. Court Madoc, CA 95951	Sutter County District Attorney 446 Second Sutter, CA 95687	Yuba County District Attorney 215 5th St Yuba, CA 95901
San Diego City Attorney City Center Plaza San Diego, CA 92101	Lassen County District Attorney 200 S Lassen St. Suite 8 Marysville, CA 95956	Monterey County District Attorney PO Box 1131 Salinas, CA 93902
Tuolumne County District Attorney 2 S Tuolumne, CA 95370	Tulare County District Attorney County Civic Tulare, CA 93276	Yolo County District Attorney 310 Second St Yolo, CA 95959
Ventura County District Attorney 800 S Victoria Ave Ventura, CA 93003	Tehama County District Attorney P.O. Box 519 Red Bluff; CA 96080	San Jose City Attorney 200 E. Santa San Jose, CA 95131