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**VIA CERTIFIED MAIL**

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6952 Buckeye Street  
Chino, CA 91710

Renzo J. Bustamante  
(Green Wealth, Inc. dba Natura-Genics'  
Registered Agent for Service of Process)  
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Chino, CA 91710

**VIA ONLINE SUBMISSION**

Office of the California Attorney General

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**VIA PRIORITY MAIL**

District Attorneys of Select 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 Environmental Research Center, Inc. (“ERC”) 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.

ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

The name of the Company covered by this notice that violated Proposition 65 (hereinafter the “Violator”) is:

**Green Wealth, Inc. dba Natura-Genics**

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

**1. Natura-Genics Formula HMR - Lead**

2. **Natura-Genics Moringa - Lead**
3. **Natura-Genics Chlorophyll Complex - Lead**
4. **Natura-Genics Green Tea Extract - Lead**
5. **Natura-Genics Feverfew Golden Line - Lead**
6. **Natura-Genics Kava Kava Golden Line - Lead**
7. **Natura-Genics Eyebright Golden Line - Lead**
8. **Natura-Genics Ginkgo Biloba Golden Line - Lead**
9. **Natura-Genics Barley Green Complex - Lead**
10. **Natura-Genics Opti-Renal - Lead**
11. **Natura-Genics Thyro Complex - Lead**
12. **Natura-Genics Gotu Kola Golden Line - Lead**
13. **Natura-Genics Arthritis Relief Kit - Lead**
  - a. **Natura-Genics Arthritis Relief Kit Artrilex Part A**
  - b. **Natura-Genics Arthritis Relief Kit Artrilex Part B**
  - c. **Natura-Genics Arthritis Relief Kit Dolorex**
14. **Natura-Genics Artrilex+ - Lead**
15. **Natura-Genics Ulcerex - Lead**
16. **Natura-Genics Hierba del Sapo- Lead**
17. **Natura-Genics Bitter Melon - Lead**
18. **Natura-Genics Phyto Slim - Lead**
19. **Natura-Genics Valerian Root Golden Line - Lead**
20. **Natura-Genics Intestinal & Liver Cleanser - Lead**
  - a. **Natura-Genics Intestinal & Liver Cleanser Intestinal Cleanser Part A**
  - b. **Natura-Genics Intestinal & Liver Cleanser Intestinal Cleanser Part B**
  - c. **Natura-Genics Intestinal & Liver Cleanser Hepa Cleanser Liver Cleanser**
21. **Natura-Genics Intestinal Cleanser Intestinal Cleanser - Lead**
  - a. **Natura-Genics Intestinal Cleanser Intestinal Cleanser Part A**
  - b. **Natura-Genics Intestinal Cleanser Intestinal Cleanser Part B**
22. **Natura-Genics Alfalfa Combination - Lead**
23. **Natura-Genics Prostalex Complex - Lead**
24. **Natura-Genics Propolis Combination - Lead**
25. **Natura-Genics Gastril - Lead**
26. **Natura-Genics Juniper Berries Golden Line - Lead**
27. **Natura-Genics Sarsaparilla Golden Line - Lead**
28. **Natura-Genics Nopal Golden Line - Lead**
29. **Natura-Genics Aloe Vera Golden Line - Lead**
30. **Natura-Genics Formula AA Kit - Lead**
31. **Natura-Genics Urinary System Kit - Lead**
  - a. **Natura-Genics Urinary System Kit Opti-Renal**
  - b. **Natura-Genics Urinary System Kit Formula CBR**
32. **Natura-Genics Glucose Control Kit - Lead**
  - a. **Natura-Genics Glucose Control Kit Diabetrim Part A**
  - b. **Natura-Genics Glucose Control Kit Diabetrim Part B**
33. **Natura-Genics Estro-Balance - Lead**
34. **Natura-Genics Hydrangea Golden Line - Lead**
35. **Natura-Genics Goldenseal Golden Line - Lead**

- 36. Natura-Genics Wild Yam Golden Line - Lead**
- 37. Natura-Genics Nettle Golden Line - Lead**
- 38. Natura-Genics Passion Flower Golden Line - Lead**
- 39. Natura-Genics Intestinal Cleanser Part B - Lead**
- 40. Natura-Genics Colon Detox+ - Lead**
- 41. Natura-Genics Polybiotic - Lead**
- 42. Natura-Genics Red Yeast Rice with Inositol - Lead**
- 43. Natura-Genics Anti-Candida Complex - Lead**
- 44. Natura-Genics Garcinia Cambogia Extract - Lead**
- 45. Natura-Genics Red Raspberry Golden Line - Lead**
- 46. Natura-Genics Black Walnut Golden Line - Lead**
- 47. Natura-Genics Horsetail Golden Line - Lead**
- 48. YerbaFarma Opti•Max Intestinal Cleanser - Lead**
- 49. Natura-Genics Aloe Vera & Prickly Pear Combination - Lead**
- 50. Natura-Genics Internal Detox 5 Day Cleanse - Lead**
- 51. Natura-Genics Graviola - Lead**
- 52. Natura-Genics Herbal Dietmax - Lead**
- 53. Natura-Genics Female Forte - Lead**

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

This letter is a notice to the Violator and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violator currently known to ERC from the information now available. ERC 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 enclosed with the copy of this letter to the Violator.

The Violator has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The method of warning should be a warning that appears on the product's label. The Violator violated Proposition 65 because it failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since April 29, 2013, 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.

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Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless the Violator agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemical; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons located in California who purchased the above products in the last three years. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemical and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,



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Rebecca Davis

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Green Wealth, Inc. dba Natura-Genics and its Registered Agent for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

**CERTIFICATE OF MERIT**

**Re: Environmental Research Center, Inc.'s Notice of Proposition 65 Violations  
by Green Wealth, Inc. dba Natura-Genics**

I, Rebecca Davis, 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 party.
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 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. 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 29, 2016

  
\_\_\_\_\_  
Rebecca Davis

**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 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On April 29, 2016, 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 U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President	Renzo J. Bustamante
Green Wealth, Inc. dba Natura-Genics	(Green Wealth, Inc. dba Natura-Genics’
6952 Buckeye Street	Registered Agent for Service of Process)
Chino, CA 91710	6952 Buckeye Street
	Chino, CA 91710

On April 29, 2016, I verified the following documents **NOTICE OF VIOLATIONS, 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)** were served on the following party when a true and correct copy thereof was uploaded on the California Attorney General’s website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice> :

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

On April 29, 2016, I verified the following documents **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** were served on the following parties when a true and correct copy thereof was sent via electronic mail to the party listed below:

Stacey Grassini, Deputy District Attorney  
Contra Costa County  
900 Ward Street  
Martinez, CA 94553  
sgrassini@contracostada.org

Dije Ndreu, Deputy District Attorney  
Monterey County  
1200 Aguajito Road  
Monterey, CA 93940  
Prop65DA@co.monterey.ca.us

Michelle Latimer, Program Coordinator  
Lassen County  
220 S. Lassen Street  
Susanville, CA 96130  
mlatimer@co.lassen.ca.us

Gary Lieberstein, District Attorney  
Napa County  
931 Parkway Mall  
Napa, CA 94559  
CEPD@countyofnapa.org

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

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Eric J. Dobroth, Deputy District Attorney  
San Luis Obispo County  
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San Jose, CA 95110  
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Gregory D. Totten, District Attorney  
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daspecialops@ventura.org

Jeff W. Reisig, District Attorney  
Yolo County  
301 Second Street  
Woodland, CA 95695  
cfepd@yolocounty.org

On April 29, 2016, I served the following documents: **NOTICE OF VIOLATIONS, 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 Priority Mail.

Executed on April 29, 2016, in Fort Oglethorpe, Georgia.

  
Phyllis Dunwoody



Service List

District Attorney, Alameda County  
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District Attorney, Amador County  
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Jackson, CA 95642

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District Attorney, Calaveras County  
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San Diego, CA 92101

San Francisco, City Attorney  
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1 Dr Carlton B Goodlett PL  
San Francisco, CA 94102

San Jose City Attorney's Office  
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San Jose, CA 95113