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**VIA CERTIFIED MAIL**

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Santa Ana, CA 92704

Current CEO or President  
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2781 West MacArthur Boulevard  
B-346  
Santa Ana, CA 92704

Current CEO or President  
Robinson Pharma, Inc.  
17870 Newhope Street  
Suite 104-238  
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Current CEO or President  
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A109 #439  
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**VIA ONLINE SUBMISSION**

Office of the California Attorney General

**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:

**Robinson Pharma, Inc.**

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

- 1. Joint Health Extra-Strength Glucosamine Chondroitin with MSM - Lead**
- 2. Joint Support OsteoNourish - Lead**
- 3. GardaVita Arthro 8 Bone & Joint Health - Lead**
- 4. Antioxidant Support ACF 223 - Lead**
- 5. Prostate Health Prostata - Lead**
- 6. Cardiovascular Health OCC - Lead**
- 7. Sinus Health Sinetic - Lead**
- 8. Circulatory Support GlucoVita - Lead**
- 9. Joint Health Arthro-7 - Lead**
- 10. GardaVita Garcinia Cambogia Extract - Lead**
- 11. Men's Health Genix - Lead**
- 12. Antioxidant Support G.H.3. - Lead**
- 13. GardaVita Lung Support Advanced - Lead**
- 14. GardaVita GH3 Advanced - Lead**
- 15. GardaVita ThyroSlend Thyroid Health - Lead**
- 16. GardaVita SlimX Complete - Lead**
- 17. Joint Health Triple-Strength Glucosamine Chondroitin with MSM - Lead**

- 18. Joint Health Mega MSM - Lead**
- 19. Eye Health Ocu-Max - Lead**
- 20. Urinary Health Control-X - Lead**
- 21. Lung Health Lung Support Formula - Lead**
- 22. Cardiovascular Health OCC - Lead**
- 23. Men's Health Sexativa Plus - Lead**
- 24. Antioxidant Support Phytoplex - Lead**
- 25. Immune Support Defense Pro - Lead**
- 26. U.S. Doctors' Clinical Prostata - Lead**
- 27. U.S. Doctors' Clinical Arthro-7 Sport - Lead**
- 28. U.S. Doctors' Clinical SlimX Complete - Lead**
- 29. U.S. Doctors' Clinical Advanced BrainPower - Lead**
- 30. U.S. Doctor's Clinical GlucoVita - Lead**
- 31. Healthy America Psyllium Husk 500 mg - Lead**
- 32. Healthy America Double-Strength Joint Comfort Glucosamine Chondroitin with MSM - Lead**
- 33. Healthy America Apple Cider Vinegar 600 mg - Lead**
- 34. Healthy America Herbal Laxative Formula - 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 recommended use of these products by consumers. The route of exposure to lead has been through ingestion. 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 March 24, 2014, 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.

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

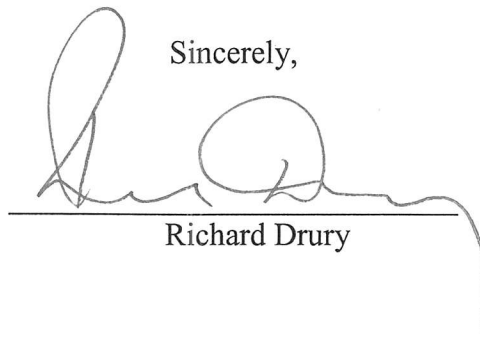
March 24, 2017

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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,

A handwritten signature in black ink, appearing to read 'Richard Drury', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Richard Drury

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Robinson Pharma, Inc. and its Registered Agent for Service of Process only)

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

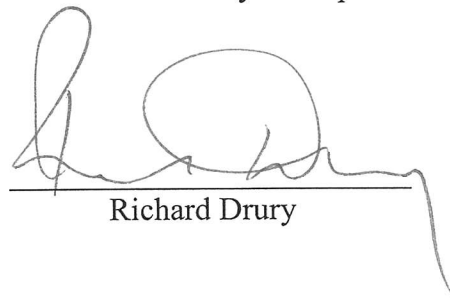
**CERTIFICATE OF MERIT**

**Re: Environmental Research Center, Inc.'s Notice of Proposition 65 Violations  
by Robinson Pharma, Inc.**

I, Richard Drury, 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: March 24, 2017



Richard Drury

**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 March 24, 2017 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 each of the parties 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  
Robinson Pharma, Inc.  
3330 South Harbor Boulevard  
Santa Ana, CA 92704

Current CEO or President  
Robinson Pharma, Inc.  
2781 West MacArthur Boulevard  
B-346  
Santa Ana, CA 92704

Current CEO or President  
Robinson Pharma, Inc.  
17870 Newhope Street  
Suite 104-238  
Fountain Valley, CA 92708

Current CEO or President  
Robinson Pharma, Inc.  
1835 Newport Boulevard  
A109 #439  
Costa Mesa, CA 92627

Current CEO or President  
Robinson Pharma, Inc.  
2781 West MacArthur Boulevard  
Suite B-363  
Santa Ana, CA 92704

Current CEO or President  
Robinson Pharma, Inc.  
2701 Harbor Boulevard  
Suite E-2 #216  
Costa Mesa, CA 92626

Current CEO or President  
Robinson Pharma, Inc.  
1683 Sunflower Avenue  
Costa Mesa, CA 92626

Current CEO or President  
Robinson Pharma, Inc.  
2973 Harbor Boulevard, #566  
Costa Mesa, CA 92626

Current CEO or President  
Robinson Pharma, Inc.  
2781 West MacArthur Boulevard  
B-347  
Santa Ana, CA 92704

Current CEO or President  
Robinson Pharma, Inc.  
15568 Brookhurst Street, Suite 374  
Westminster, CA 92683

Tam Nguyen  
(Robinson Pharma, Inc.'s  
Registered Agent for Service of Process)  
3330 South Harbor Boulevard  
Santa Ana, CA 92704

On March 24, 2017, 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 March 24, 2017, 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 each of the parties listed below:

Stacey Grassini, Deputy District Attorney  
Contra Costa County  
900 Ward Street  
Martinez, CA 94553  
[sgrassini@contracostada.org](mailto:sgrassini@contracostada.org)

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Michelle Latimer, Program Coordinator  
Lassen County  
220 S. Lassen Street  
Susanville, CA 96130  
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222 E. Weber Avenue, Room 202  
Stockton, CA 95202  
[DAConsumer.Environmental@sjcda.org](mailto:DAConsumer.Environmental@sjcda.org)

Dije Ndreu, Deputy District Attorney  
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Eric J. Dobroth, Deputy District Attorney  
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Napa, CA 94559  
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Stephan R. Passalacqua, District Attorney  
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Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

March 24, 2017

Page 9

Gregory D. Totten, District Attorney  
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daspecialops@ventura.org

Jeff W. Reisig, District Attorney  
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301 Second Street  
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cfepd@yolocounty.org

On March 24, 2017, 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 March 24, 2017, in Fort Oglethorpe, Georgia.



---

Phyllis Dunwoody

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

March 24, 2017

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County  
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