

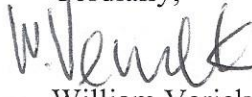


July 27, 2017

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

Greetings:

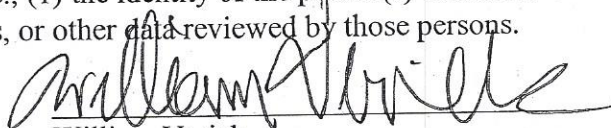
This office and the Mateel Environmental Justice Foundation ("Mateel") hereby give you notice that HomeGoods, Inc. is, has been, will be and threatens to be in violation of Cal. Health & Safety Code §25249.6. This office and Mateel are both private enforcers of Proposition 65, both organizations may be reached at the below-listed address and telephone number, I may be considered a "responsible individual" at both organizations, and I may be contacted at the same address and telephone number. The above referenced violations occur when Homegoods, Inc. markets leaded crystal glassware such as decanters, tumblers, wine glasses, champagne flutes, and cocktail glasses (as for martinis) (collectively hereinafter "leaded crystal glassware"). Handling of, contact with, drinking from, and cleaning up broken glass from leaded crystal glassware exposes people to lead and lead compounds, including lead oxide (hereinafter, collectively, "lead"). Lead leaches from the glassware into the food or beverage stored in, or served from, the glassware. The food or beverage is then consumed and the accompanying lead ingested. These exposures (and resulting violations) occur occupationally and as the result of the sale of consumer products and/or services. In occupational settings, the type of work that is done during which the above-referenced exposures occur is handling the leaded crystal glassware, cleaning up broken glass from them, and drinking from them, such as at wine tastings and office parties. These exposures occur via the dermal absorption, inhalation, ingestion, and subcutaneous routes. These violations have occurred every day since at least July 27, 2014 and will continue every day until reasonable warnings are given to those people exposed or until HomeGoods, Inc. stops selling leaded crystal glassware.

Cordially,

William Verick

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 7, 2017

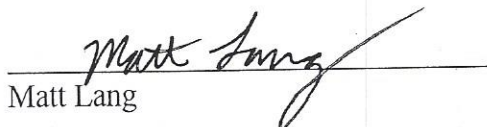

William Verick

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 1125 Sixteenth Street, Suite 204, Arcata, California, 95521. On July 7, 2017, 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 7, 2017, at Arcata, 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

OAKLAND CITY ATTORNEY
CITY HALL 6TH FLOOR
1 FRANK OGAWA PLAZA
OAKLAND, CA 94612

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CITY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

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CITY OF SACRAMENTO
915 I STREET, 4TH FLOOR
SACRAMENTO, CA 95814-2608

OFFICE OF THE CITY ATTORNEY
CITY OF SAN JOSE
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113

OFFICE OF THE CITY ATTORNEY
CITY OF LOS ANGELES
200 N. MAIN ST.
LOS ANGELES, CA 90012

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CITY OF SAN DIEGO CONSUMER &
ENVIRONMENTAL PROTECTION
1200 THIRD AVENUE, SUITE 700
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MARKLEEVILLE, CA 96120

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COUNTY OF AMADOR
708 COURT STREET
JACKSON, CA 95642

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF BUTTE
25 COUNTY CENTER DR.
OROVILLE, CA 95965

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF CALAVERAS
GOVERNMENT CENTER
891 MOUNTAIN RANCH ROAD
SAN ANDREAS, CA 95249

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COUNTY OF COLUSA
547 MARKET STREET
COLUSA, CA 95932

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P.O. BOX 670
MARTINEZ, CA 94553

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COUNTY OF DEL NORTE
450 H ST #171
CRESCENT CITY, CA 95531

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COUNTY OF EL DORADO
515 MAIN ST.
PLACERVILLE, CA 95667

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2220 TULARE ST #1000
FRESNO, CA 93721

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P.O. DRAWER D
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HANFORD, CA 93230

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255 N. FORBES ST # 424
LAKEPORT, CA 95453

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COUNTY OF LASSEN
220 SOUTH LASSEN ST. STE 8
SUSANVILLE, CA 96130

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COUNTY OF LOS ANGELES
HALL OF JUSTICE
211 W TEMPLE STREET STE 1200
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209 W. YOSEMITE AVE.
MADERA, CA 93637

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HALL OF JUSTICE #183
SAN RAFAEL, CA 94903

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MARIPOSA, CA 95338

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COUNTY OF MENDOCINO
PO BOX 1000
UKIAH, CA 95482

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2222 M ST.
MERCED, CA 95340

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COUNTY OF MODOC
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ALTURAS, CA 96101

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BRIDGEPORT, CA 93517

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SALINAS, CA 93902

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NEVADA CITY, CA 95959

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401 CIVIC CENTER DR WEST
SANTA ANA, CA 92701

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COUNTY OF PLACER
10810 JUSTICE CENTER DR. STE 240
ROSEVILLE, CA 95678

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QUINCY, CA 95971

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3960 ORANGE ST.
RIVERSIDE, CA 92501

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SACRAMENTO, CA 95814

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HOLLISTER, CA 95023

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COUNTY OF SAN BERNARDINO
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SAN BERNARDINO, CA 92415-0004

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SAN DIEGO, CA 92101

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SAN FRANCISCO, CA 94103

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STOCKTON, CA 95202

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COUNTY OF SAN LUIS OBISPO
COUNTY GOVERNMENT CENTER #450
SAN LUIS OBISPO, CA 93408

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HALL OF JUSTICE AND RECORDS
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MODESTO, CA 95354

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WEAVERVILLE, CA 96093

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VISALIA, CA 93291

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VENTURA, CA 93009

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301 SECOND STREET
WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YUBA
215 5TH ST.
MARYSVILLE, CA 95901

JOHN RICCIUTI, PRESIDENT
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FRAMINGHAM, MA 01701