# ECOLOGY LAW CENTER P.O. Box 1000 Santa Cruz, California 95061 Telephone: (831) 454-8216 Email: <u>Evenson@ecologylaw.com</u>

**DECEMBER 4, 2017** 

# NOTICE OF VIOLATIONS

CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT

Fred Clark, President	Cory Mellinger, Registered Agent
Clark Associates, Inc.	The Webstaurant Store, Inc.
2205 Old Philadelphia Pike	111 Airpark Vista Road
Lancaster, PA 17602	Dayton, NV 89403

# AND THE PUBLIC PROSECUTORS LISTED ON THE DISTRIBUTION LIST ACCOMPANYING THE ATTACHED CERTIFICATE OF SERVICE

Re: Violations of Proposition 65 Concerning Carbon Monoxide Exposures from Charcoal Grills

In accord with California Health & Safety Code § 25249.7, Ecological Rights Foundation ("ERF") hereby gives you notice that the above company has violated and is in ongoing violation of California Health & Safety Code § 25249.6, which provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual."

Pursuant to California Health & Safety Code § 25249.7, ERF intends to bring an enforcement action 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify the violations discussed in this notice letter. The public enforcement agencies that have been served with copies of this notice of violations are identified in the attached Certificate of Service.

This Notice of Violations ("Notice") is provided to you pursuant to and in compliance with California Health and Safety Code Section 25249.7(d). Attached for your reference is a summary, "Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary" prepared by the California Office of Environmental Health Hazard Assessment ("OEHHA"). Pursuant to Title 11, C.C.R. § 3100, a Certificate of Merit is also attached.

The above-referenced violations occur when California residents use charcoal-burning grills. These products are used primarily for cooking. Combustion of charcoal produces and exposes people to **carbon monoxide**, a chemical known to the State of California to cause reproductive toxicity. Because the combustion of charcoal causes carbon monoxide to be released into the air, people using charcoal-burning grills, and others standing near the products when charcoal is burning in or on the products, inhale carbon monoxide. Exposure to carbon monoxide is via the inhalation route.

Below is a list of the products subject to this notice. Though specific models or SKU or product numbers are given as examples, this Notice also pertains to all models, and all variations, of these

vendors' charcoal grills sold through The Webstaurant Store Inc.

## Backyard Pro 30" Heavy-Duty Steel Charcoal Grill, Item # 554CHAR30

This non-exclusive list of examples of the type of products that are subject to this Notice is for the recipient's benefit and is not meant to be an exhaustive or comprehensive identification of each specific offending product. It is ERF's position that the alleged Violator is obligated to conduct a good faith investigation into other specific products within the identified category or type that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipient's custody or control) during the past three years, to ensure that clear and reasonable warnings are provided to California citizens prior to purchase, or retroactively if necessary.

These products cause carbon monoxide exposures to occur in people's yards and everywhere else throughout California where these products are used. These violations are alleged for consumer and environmental exposures.

The noticed party did not and does not provide people with clear and reasonable warnings before they expose them in California to carbon monoxide. The above-referenced violations have occurred every day since at least December 4, 2014 and will continue every day until clear and reasonable warnings are given.

ERF is a California non-profit corporation dedicated to protecting human and environmental health, including raising awareness of, and reducing exposures to, toxic chemicals. The following individual is the responsible individual within ERF for purposes of this Notice:

James Lamport, Executive Director Ecological Rights Foundation 867 B Redwood Drive Garberville, California 95542 Telephone: (707) 923-4372

ERF has retained the following counsel to represent them in this matter (please direct communications to counsel):

Fredric Evenson Ecology Law Center P.O. Box 1000 Santa Cruz, California 95061 Telephone: (831) 454-8216 Email: evenson@ecologylaw.com

## Resolution of Noticed Claims:

ERF is interested in seeking a constructive resolution of this matter that advances the public interest without engaging in costly and protracted litigation. ERF is willing to settle this matter to the extent legally possible prior to the commencement of any enforcement action. Settlement terms would require that the unwarned exposures described in this Notice of Violation be stopped. That would require at least the following: 1) a potential recall of products already sold; 2) that either warnings be given to all future purchasers in California of the products subject to this Notice, that the products be reformulated to eliminate the exposures described in the Notice, or that you stop marketing, distributing or selling the products in California; 3) that you locate

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and provide a warning compliant with 27 Cal. Code Regs Section 25601 to each person who has been subject to the unwarned exposures described in the Notice to the extent those exposures are caused by products that were sold in California during the past three years; and 4) that you pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249(b). It should be noted that ERF cannot finalize any settlement of this matter until 70 days have elapsed since the sending of the Notice and unless no public enforcer has begun an enforcement action concerning the violations described in the Notice. Any settlement on behalf of the public interest must be approved by the California Superior Court on noticed motion with 45 days' notice to the California Attorney General. The Attorney General may appear at any approval hearing and oppose a settlement if he or she believes the proposed settlement is not in the public interest. If you wish to discuss settlement of this matter before ERF files suit, please promptly contact ERF's counsel.

Sincerely,

Fredric Evenson

#### 27 CCR Appendix A Appendix A

#### OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

The following summary has been prepared by the California Office of Environmental Health Hazard Assessment (OEHHA), the lead agency for the implementation of the Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as "Proposition 65"). A copy of this summary must be included as an attachment to any notice of violation served upon an alleged violator of the Act. The summary provides basic information about the provisions of the law, and is intended to serve only as a convenient source of general information. It is not intended to provide authoritative guidance on the meaning or application of the law. Please refer to the statute and OEHHA's implementing regulations (see citations below) for further information. FOR INFORMATION CONCERNING THE BASIS FOR THE ALLEGATIONS IN THE NOTICE RELATED TO YOUR BUSINESS, CONTACT THE PERSON IDENTIFIED ON THE NOTICE.

The text of Proposition 65 (Health and Safety Code Sections 25249.5 through 25249.13) is available online at:

http://oehha.ca.gov/prop65/law/P65law72003.html. Regulations that provide more specific guidance on compliance, and that specify procedures to be followed by the State in carrying out certain aspects of the law, are found in Title 27 of the California Code of Regulations, sections 25102 through 27001.1 These implementing regulations are available online at: http://oehha.ca.gov/prop65/law/P65Regs.html.

## WHAT DOES PROPOSITION 65 REQUIRE?

The "Proposition 65 List." Under Proposition 65, the lead agency (OEHHA) publishes a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. Chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as damage to female or male reproductive systems or to the developing fetus. This list must be updated at least once a year. The current Proposition 65 list of chemicals is available on the OEHHA website at: http://www.oehha.ca.gov/prop65/prop65\_list/Newlist.html. Only those chemicals that are on the list are regulated under Proposition 65. Businesses that produce, use, release or otherwise engage in activities involving listed chemicals must comply with the following:

Clear and reasonable warnings. A business is required to warn a person before "knowingly and intentionally" exposing that person to a listed chemical unless an exemption applies. The warning given must be "clear and reasonable." This means that the warning must: (1) clearly say that the chemical involved is known to cause cancer, or birth defects or other reproductive harm; and (2) be given in such a way that it will effectively reach the person before he or she is exposed to that chemical. Some exposures are exempt from the warning requirement under certain circumstances discussed below.

Prohibition from discharges into drinking water. A business must not knowingly discharge or release a listed chemical into water or onto land where it passes or probably will pass into a source of drinking water. Some discharges are exempt from this requirement under certain circumstances discussed below

## DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?

Yes. You should consult the current version of the statute and regulations (http://www.oehha.ca.gov/prop65/law/index.html) to determine all applicable exemptions, the most common of which are the following:

Grace Periods. Proposition 65 warning requirements do not apply until 12 months after the chemical has been listed. The Proposition 65 discharge prohibition does not apply to a discharge or release of a chemical that takes place less than 20 months after the listing of the chemical. Governmental agencies and public water utilities. All agencies of the federal, state or local government, as well as entities operating public water systems, are exempt.

Businesses with nine or fewer employees. Neither the warning requirement nor the discharge prohibition applies to a business that employs a total of nine or fewer employees. This includes all employees, not just those present in California.

Exposures that pose no significant risk of cancer. For chemicals that are listed under Proposition 65 as known to the State to cause cancer, a warning is not required if the business causing the exposure can demonstrate that the exposure occurs at a level that poses "no significant risk." This means that the exposure is calculated to result in not more than one excess case of cancer in 100,000 individuals exposed over a 70-year lifetime. The Proposition 65 regulations identify specific "No Significant Risk Levels" (NSRLs) for many listed carcinogens. Exposures below these levels are exempt from the warning requirement. See OEHHA's website at: http://www.oehha.ca.gov/prop65/getNSRLs.html for a list of NSRLs, and Section 25701 et seq. of the regulations for information concerning how these levels are calculated.

Exposures that will produce no observable reproductive effect at 1,000 times the level in question. For chemicals known to the State to cause reproductive toxicity, a warning is not required if the business causing the exposure can demonstrate that the exposure will produce no observable effect, even at 1,000 times the level in question. In other words, the level of exposure must be below the "no observable effect level" divided by 1,000. This number is known as the Maximum Allowable Dose Level (MADL). See OEHHA's website at: http://www.oehha.ca.gov/prop65/getNSRLs.html for a list of MADLs, and Section 25801 et seq. of the regulations for information concerning how these levels are calculated.

Exposures to Naturally Occurring Chemicals in Food. Certain exposures to chemicals that naturally occur in foods (i.e., that do not result from any known human activity, including activity by someone other than the person causing the exposure) are exempt from the warning requirements of the law. If the chemical is a contaminant<sup>2</sup> it must be reduced to the lowest level feasible. Regulations explaining this exemption can be found in Section 25501. Discharges that do not result in a "significant amount" of the listed chemical entering any source of drinking water. The prohibition from discharges into drinking water does not apply if the discharger is able to demonstrate that a "significant amount" of the listed chemical has not, does not, or will not pass into or probably pass into a source of drinking water, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A "significant amount" means any detectable amount, except an amount that would meet the "no significant risk" level for chemicals that cause cancer or that is 1,000 times below the "no observable effect" level for chemicals that cause reproductive toxicity, if an individual were exposed to that amount in drinking water.

## HOW IS PROPOSITION 65 ENFORCED?

Enforcement is carried out through civil lawsuits. These lawsuits may be brought by the Attorney General, any district attorney, or certain city attorneys. Lawsuits may also be brought by private parties acting in the public interest, but only after providing notice of the alleged violation to the Attorney General, the appropriate district attorney and city attorney, and the business accused of the violation. The notice must provide adequate information to allow the recipient to assess the nature of the alleged violation. The notice must comply with the information and procedural requirements specified in Section 25903 of Title 27 and sections 3100-3103 of Title 11. A private party may not pursue an independent enforcement action under Proposition 65 if one of the governmental officials noted above initiates an enforcement action within sixty days of the notice.

A business found to be in violation of Proposition 65 is subject to civil penalties of up to \$2,500 per day for each violation. In addition, the business may be ordered by a court to stop committing the violation.

A private party may not file an enforcement action based on certain exposures if the alleged violator meets specific conditions. For the following types of exposures, the Act provides an opportunity for the business to correct the alleged violation:

An exposure to alcoholic beverages that are consumed on the alleged violator's premises to the extent onsite consumption is permitted by law;
An exposure to a Proposition 65 listed chemical in a food or beverage prepared and sold on the alleged violator's premises that is primarily intended for immediate consumption on- or off- premises. This only applies if the chemical was not intentionally added to the food, and was formed by cooking or similar preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination;

• An exposure to environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises;

• An exposure to listed chemicals in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking non-commercial vehicles.

If a private party alleges that a violation occurred based on one of the exposures described above, the private party must first provide the alleged violator a notice of special compliance procedure and proof of compliance form.

A private party may not file an action against the alleged violator for these exposures, or recover in a settlement any payment in lieu of penalties any reimbursement for costs and attorney's fees, if the notice was served on or after October 5, 2013, and the alleged violator has done *all* of the following within 14 days of being served notice:

• Corrected the alleged violation;

• Agreed to pay a civil penalty of \$500 (subject to change as noted below) to the private party within 30 days; and

• Notified the private party serving the notice in writing that the violation has been corrected.

The written notification to the private-party must include a notice of special compliance procedure and proof of compliance form completed by the alleged violator as directed in the notice. On April 1, 2019, and every five years thereafter, the dollar amount of the civil penalty will be adjusted by the Judicial Council based on the change in the annual **California** Consumer Price Index. The Judicial Council will publish the dollar amount of the adjusted civil penalty at each five-year interval, together with the date of the next scheduled adjustment.

An alleged violator may satisfy these conditions only one time for a violation arising from the same exposure in the same facility or on the same premises. The satisfaction of these conditions does not prevent the Attorney General, a district attorney, a city attorney of a city of greater than 750,000 population, or any full-time city prosecutor with the consent of the district attorney, from filing an enforcement action against an alleged violator. The amount of any civil penalty for a violation shall be reduced to reflect any payment made by the alleged violator for the same alleged violation to a private-party. A copy of the notice of special compliance procedure and proof of compliance form is included with this notice and can be downloaded from OEHHA's website at: http://oehha.ca.gov/prop65/law/p65/law72003.html. The notice is reproduced here:

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Date:

Name of Noticing Party or attorney for Noticing Party:

Address:

Phone number:

## SPECIAL COMPLIANCE PROCEDURE

#### PROOF OF COMPLIANCE

You are receiving this form because the Noticing Party listed above has alleged that you are violating California Health and Safety Code §25249.6 (Prop. 65).

The Noticing Party may not bring any legal proceedings against you for the alleged violation checked below if:

1. You have actually taken the corrective steps that you have certified in this form

2. The Noticing Party has received this form at the address shown above, accurately completed by you, postmarked within 14 days of your receiving this notice

3. The Noticing Party receives the required \$500 penalty payment from you at the address shown above postmarked within 30 days of your receiving this notice.

4. This is the first time you have submitted a Proof of Compliance for a violation arising from the same exposure in the same facility on the same premises.

## PART 1: TO BE COMPLETED BY THE NOTICING PARTY OR ATTORNEY FOR THE NOTICING PARTY

The alleged violation is for an exposure to: (check one)

\_\_\_\_\_Alcoholic beverages that are consumed on the alleged violator's premises to the extent on-site consumption is permitted by law.

\_\_\_\_A chemical known to the state to cause cancer or reproductive toxicity in a food or beverage prepared and sold on the alleged violator's premises for immediate consumption on or off premises to the extent: (1) the chemical was not intentionally added; and (2) the chemical was formed by cooking or similar preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination.

\_\_\_Environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises.

\_\_\_Chemicals known to the State to cause cancer or reproductive toxicity in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking noncommercial vehicles.

#### **IMPORTANT NOTES:**

1. You have no potential liability under California Health and Safety Code §25249.6 if your business has nine (9) or fewer employees.

2. Using this form will NOT prevent the Attorney General, a district attorney, a city attorney, or a prosecutor in whose jurisdiction the violation is alleged to have occurred from filing an action over the same alleged violations, and that in any such action, the amount of civil penalty shall be reduced to reflect any payment made at this time.

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Date :

Name of Noticing Party or attorney for Noticing Party:

Address: Phone number:

## PART 2: TO BE COMPLETED BY THE ALLEGED VIOLATOR OR AUTHORIZED REPRESENTATIVE

## **Certification of Compliance**

Accurate completion of this form will demonstrate that you are now in compliance with California Health and Safety Code §25249.6 for the alleged violation listed above. You must complete and submit the form below to the Noticing Party at the address shown above, postmarked within 14 days of you receiving

this notice.

I hereby agree to pay, within 30 days of completion of this notice, a civil penalty of \$500 to the Noticing Party only and certify that I have complied with <u>Health</u> and <u>Safety</u> Code <u>\$25249.6</u> by (check only one of the following):

Posting a warning or warnings about the alleged exposure that complies with the law, and attaching a copy of that warning and a photograph accurately showing its placement on my premises;

Desting the warning or warnings demanded in writing by the Noticing Party, and attaching a copy of that warning and a photograph accurately its placement on my premises; OR

Eliminating the alleged exposure, and attaching a statement accurately describing how the alleged exposure has been eliminated.

### Certification

My statements on this form, and on any attachments to it, are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I have carefully read the instructions to complete this form. I understand that if I make a false statement on this form, I may be subject to additional penalties under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

Signature of alleged violator or authorized representative Date

Name and title of signatory

FOR FURTHER INFORMATION ABOUT THE LAW OR **REGULATIONS**...

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at P65Public.Comments@oehha.ca.gov.

## **Certificate of Merit** Health & Safety Code Section 25249.7(d)

I, Fredric Evenson, hereby declare:

(1) This Certificate of Merit accompanies the attached sixty-day notice(s) 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.

(2) I am the attorney for the noticing party.

(3) 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 alleged exposure to the listed chemical that is the subject of the action.

(4) 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 plaintiff's 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.

(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 Health and Safety Code section 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.

Date: December 4, 2017

By:

Fredric Evenson

# **CERTIFICATE OF SERVICE**

I am a California resident, over the age of 18 and not a party to this case. My business address is P.O. Box 1000, Santa Cruz, CA 95061.

On December 4, 2017, I served the following:

- 1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act
- 2) Certificate of Merit: Health and Safety Code Section 25249.7(d)
- 3) Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary
- 4) Certificate of Service

by enclosing copies of the same in a sealed envelope addressed to each person shown below and depositing the envelope in the U.S. mail with postage fully prepaid for delivery by Certified Mail. Place of mailing: Santa Cruz, CA.

Fred Clark, President	Cory Mellinger, Registered Agent
Clark Associates, Inc.	The Webstaurant Store, Inc.
2205 Old Philadelphia Pike	111 Airpark Vista Road
Lancaster, PA 17602	Dayton, NV 89403

On December 4, 2017, I also served the following:

- 1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act
- 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) Certificate of Service

by enclosing copies of the same in sealed envelopes addressed to each of the public prosecutors listed on the attached Service List with physical mailing addresses, and depositing the envelopes in the U.S. mail with postage fully prepaid for delivery by First Class Mail. Place of mailing: Santa Cruz, CA.

by sending portable document format (.pdf) files of the same to the electronic mail addresses to each of the public prosecutors identified by the California Attorney General as having authorized electronic service of notices. These public enforcement agencies appear on the attached Service List with their electronic mail addresses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed December 4, 2017, at Santa Cruz, CA.

Yair Chaver

# Service List – Public Prosecutors

Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the District Attorney
Alameda County	Lassen County	San Benito County	Tehama County
1225 Fallon Street, Room 900	mlatimer@co.lassen.ca.us	419 4th Street	P.O. Box 519
Oakland, CA 94612		Hollister, CA 95023	Red Bluff, CA 96080
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the District Attorney
Alpine County P.O. Box 248	Los Angeles County	San Bernardino County 303 W. Third Street	Trinity County P.O. Box 310
Markleeville, CA 96120	211 W. Temple Street, Suite 1200 Los Angeles, CA 90012	San Bernardino, CA 92415	Weaverville, CA 96093
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the District Attorney
Amador County	Madera County	San Diego County	Tulare County
708 Court Street. #202	209 West Yosemite Avenue	330 W. Broadway, Suite 1300	Prop65@co.tulare.ca.us
Jackson, CA 95642	Madera, CA 93637	San Diego, CA 92101	r ropos agoon and coulds
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the District Attorney
Butte County	Marin County	San Francisco County	Tuolumne County
25 County Center Drive	3501 Civic Center Drive, Room 130	gregory.alker@sfgov.org	423 N. Washington Street
Oroville, CA 95965	San Rafael, CA 94903		Sonora, CA 95370
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the District Attorney
Calaveras County	Mariposa County	San Joaquin County	Ventura County
391 Mountain Ranch Road	P.O. Box 730	DAConsumer.Environmental@sjcda.org	daspecialops@ventura.org
San Andreas, CA 95249	Mariposa, CA 95338		
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the District Attorney
Colusa County	Mendocino County	San Luis Obispo County	Yolo County
346 5th Street, Suite 101	P.O. Box 1000	edobroth@co.slo.ca.us	cfepd@yolocounty.org
Colusa, CA 95932	Ukiah, CA 95482	Office of the District Atterney	Office of the District Attended
Office of the District Attorney	Office of the District Attorney Merced County	Office of the District Attorney San Mateo County	Office of the District Attorney Yuba County
Contra Costa County	550 West Main Street	400 County Center, Third Floor	215 Fifth Street, Suite 152
grassini@contracostada.org	Merced, CA 95340	Redwood City, CA 94063	Marysville, CA 95901
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Oakland City Attorney
Del Norte County	Modoc County	Santa Barbara County	City Hall, 6th Floor
450 H Street, Room 171	204 S. Court Street Room 202	1112 Santa Barbara Street	I Frank Ogawa Plaza
Crescent City, CA 95531	Alturas, CA 96101	Santa Barbara, CA 93101	Oakland, California 94612
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the City Attorney
El Dorado County	Mono County	Santa Clara County	City of San Francisco
515 Main Street	P.O. Box 617	EPU@da.sccgov.org	City Hall, Room 234
Placerville, CA 95667	Bridgeport, CA 93517		1 Dr. Carlton B. Goodlett Pl.
·		0.000	San Francisco, CA 94102
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the City Attorney
Fresno County 2220 Tulare Street, Suite 1000	Monterey County	Santa Cruz County 701 Ocean Street, Room 200	City of Sacramento 915 1 Street, 4th Floor
Fresno, CA 93721	Prop65DA@co.monterey.ca.us	Santa Cruz, CA 95060	Sacramento, CA 95814
Office of the District Attorney		Office of the District Attorney	Office of the City Attorney
Glenn County	Office of the District Attorney	Shasta County	City of San Jose
P.O. Box 430	Napa County	1355 West Street	200 E. Santa Clara St.
Willows, CA 95988	CEPD@countyofnapa.org	Redding, CA 96001	San Jose, CA 95113
	Office of the District Attorney	Office of the District Attorney	Office of the City Attorney
Office of the District Attorney	Nevada County	Sierra County	City of Los Angeles
Humboldt County	201 Commercial Street	P.O. Box 457	200 N. Main Street, Suite 800
25 5th Street, 4th Floor	I	Downieville, CA 95936	Los Angeles, CA 90012
Suraka CA 05501	Nevada City, CA 95959	Downerme, CA 75750	
Office of the District Attorney	Office of the District Attorney	Office of the District Attorney	Office of the City Attorney
Office of the District Attorney mperial County	Office of the District Attorney Orange County	Office of the District Attorney Siskiyou County	Office of the City Attorney City of San Diego
Office of the District Attorney mperial County 940 West Main Street, Suite 102	Office of the District Attorney Orange County 401 Civic Center Drive West	Office of the District Attorney Siskiyou County P.O. Box 986	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620
Office of the District Attorney mperial County 140 West Main Street, Suite 102 El Centro, CA 92243	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101
Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement
Diffice of the District Attorney mperial County 240 West Main Street, Suite 102 El Centro, CA 92243 Diffice of the District Attorney nyo County	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney Placer County	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting
Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney Inyo County P.O. Box D	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney Placer County 10810 Justice Center Drive	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator
Office of the District Attorney imperial County 240 West Main Street, Suite 102 21 Centro, CA 92243 Office of the District Attorney nyo County P.O. Box D	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney Placer County	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street
Office of the District Attorney mperial County 40 West Main Street, Suite 102 21 Centro, CA 92243 Office of the District Attorney nyo County P.O. Box D	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney Placer County 10810 Justice Center Drive	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street P.O. Box 70550
Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney Inyo County P.O. Box D Independence, CA 93526	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney Placer County 10810 Justice Center Drive Roseville, CA 95678	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street
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Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney nyo County P.O. Box D Independence, CA 93526 Office of the District Attorney Kern County 1215 Truxtun Avenue	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701 Office of the District Attorney Placer County 10810 Justice Center Drive Roseville, CA 95678 Office of the District Attorney Plumas County 520 Main Street, Room 404 Quincy, CA 95971	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533 Office of the District Attorney Sonoma County	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street P.O. Box 70550
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Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney Inyo County P.O. Box D Independence, CA 93526 Office of the District Attorney Kern County 1215 Truxtun Avenue Bakersfield, CA 93301 Office of the District Attorney Kings County	Office of the District Attorney         Orange County         401 Civic Center Drive West         Santa Ana, CA 92701         Office of the District Attorney         Placer County         10810 Justice Center Drive         Roseville, CA 95678         Office of the District Attorney         Plumas County         520 Main Street, Room 404         Quincy, CA 95971         Office of the District Attorney         Riverside County	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533 Office of the District Attorney Sonoma County jbarnes@sonoma-county.org Office of the District Attorney Stanislaus County	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street P.O. Box 70550
Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney Inyo County P.O. Box D Independence, CA 93526 Office of the District Attorney Kern County 1215 Truxtun Avenue Bakersfield, CA 93301 Office of the District Attorney Kings County 1400 West Lacey Blvd.	Office of the District Attorney         Orange County         401 Civic Center Drive West         Santa Ana, CA 92701         Office of the District Attorney         Placer County         10810 Justice Center Drive         Roseville, CA 95678         Office of the District Attorney         Plumas County         520 Main Street, Room 404         Quincy, CA 95971         Office of the District Attorney	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533 Office of the District Attorney Sonoma County jbarnes@sonoma-county.org Office of the District Attorney Stanislaus County 832 12th Street, Suite 300	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street P.O. Box 70550
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Eureka, CA 95501 Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 Office of the District Attorney Inyo County P.O. Box D Independence, CA 93526 Office of the District Attorney Kern County 1215 Truxtun Avenue Bakersfield, CA 93301 Office of the District Attorney Kings County 1400 West Lacey Blvd. Hanford, CA 93230 Office of the District Attorney	Office of the District Attorney         Orange County         401 Civic Center Drive West         Santa Ana, CA 92701         Office of the District Attorney         Placer County         10810 Justice Center Drive         Roseville, CA 95678         Office of the District Attorney         Plumas County         520 Main Street, Room 404         Quincy, CA 95971         Office of the District Attorney         Riverside County         Prop65@rivcoda.org         Office of the District Attorney	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097 Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533 Office of the District Attorney Sonoma County jbarnes@sonoma-county.org Office of the District Attorney Stanislaus County 832 12th Street, Suite 300 Modesto, CA 95354 Office of the District Attorney	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101 Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street P.O. Box 70550
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