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**VIA CERTIFIED MAIL**

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Current CEO or President  
Premier Research Labs, LP  
19227 Pleasant Valley Road  
North San Juan, CA 95960

Current CEO or President  
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22434 Montezuma Lane  
Nevada City, CA 95959

Current CEO or President  
Quantum Nutrition Labs, LP  
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Current CEO or President  
Quantum Nutrition Labs, LP  
19227 Pleasant Valley Road  
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**VIA ONLINE SUBMISSION**

**VIA FIRST CLASS MAIL**

Office of the California Attorney General

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 names of the Companies covered by this notice that violated Proposition 65 (hereinafter the “Violators”) are:

**Premier Research Labs, LP  
Quantum Nutrition Labs, LP  
Nutraceutical Systems International, LP  
Nutraceutical Leasing International, LP**

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

- 1) **Quantum Nutrition Labs LP Quantum Bladder Support - Lead**
- 2) **Premier Research Labs LP Uriven - Lead**
- 3) **Premier Research Labs LP Nucleo Immune - Lead**
- 4) **Quantum Nutrition Labs LP Quantum Nucleotide Complex - Lead**
- 5) **Premier Research Labs LP PancreVen - Lead**
- 6) **Quantum Nutrition Labs LP Quantum Blood Sugar Support - Lead**
- 7) **Premier Research Labs LP Premier Glutathione Complex - Lead**
- 8) **Quantum Nutrition Labs LP Quantum Glutathione Support - Lead**
- 9) **Premier Research Labs LP Premier Psyllium Fiber - Lead**
- 10) **Quantum Nutrition Labs LP Quantum Psyllium Fiber - Lead**
- 11) **Quantum Nutrition Labs LP Quantum Kidney Support - Lead**
- 12) **Premier Research Labs LP Renaven - Lead**
- 13) **Premier Research Labs LP Reishi Immune - Lead**
- 14) **Quantum Nutrition Labs LP Quantum Reishi – Lead**
- 15) **Premier Research Labs LP Royal Jelly – 100 - Lead**

- 16) Quantum Nutrition Labs LP Quantum Tomato - Lead**
- 17) Premier Research Labs LP Premier Tomato - Lead**
- 18) Premier Research Labs LP Tranquinol - Lead**
- 19) Quantum Nutrition Labs LP Quantum Sleep - Lead**
- 20) Premier Research Labs LP Premier Whey Protein (formerly known as Whey Peptin) - Lead**
- 21) Quantum Nutrition Labs LP Quantum Whey Protein - Lead**
- 22) Premier Research Labs LP Premier Zeolite Complex – 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 Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators 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 Violators.

The Violators have manufactured, marketed, distributed, and/or sold the listed products, which has exposed and continues 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 Violators violated Proposition 65 because they 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 January 18, 2015, 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 Violators agree 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.

January 18, 2018

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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 "Michael R. Lozeau", written over a horizontal line.

Michael Lozeau

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Premier Research Labs, LP, Quantum Nutrition Labs, LP, Nutraceutical Systems International, LP, Nutraceutical Leasing International, LP and their Registered Agents 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 Premier Research Labs, LP, Quantum Nutrition Labs, LP, Nutraceutical Systems International, LP and Nutraceutical Leasing International, LP**

I, Michael Lozeau, 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 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 Violators 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: January 18, 2018

  
Michael Lozeau

**CERTIFICATE OF SERVICE PURSUANT TO 27 CCR § 25903**

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 and over the age of 18 years of age. 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 January 18, 2018 between 8:00 a.m. and 5:00 p.m. Eastern Time, 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  
Premier Research Labs, LP  
3500 Wadley Place, Suite B  
Austin, TX 78728

Robert J. Marshall  
(Premier Research Labs, LP’s  
Registered Agent for Service of Process)  
3500 Wadley Place, Suite B  
Austin, TX 78728

Current CEO or President  
Premier Research Labs, LP  
19227 Pleasant Valley Road  
North San Juan, CA 95960

Robert J. Marshall  
(Quantum Nutrition Labs, LP’s  
Registered Agent for Service of Process)  
3500 Wadley Place, Suite B  
Austin, TX 78728

Current CEO or President  
Premier Research Labs, LP  
22434 Montezuma Lane  
Nevada City, CA 95959

Current CEO or President  
Nutraceutical Systems International, LP  
3500 Wadley Place, Building B  
Austin, TX 78728

Current CEO or President  
Quantum Nutrition Labs, LP  
3500 Wadley Place, Suite B  
Austin, TX 78728

Current CEO or President  
Nutraceutical Leasing International, LP  
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Current CEO or President  
Quantum Nutrition Labs, LP  
19227 Pleasant Valley Road  
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Robert J. Marshall  
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Registered Agent for Service of Process)  
3500 Wadley Place, Building B  
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Current CEO or President  
Quantum Nutrition Labs, LP  
22434 Montezuma Lane  
Nevada City, CA 95959

Robert J. Marshall  
(Nutraceutical Leasing International, LP’s  
Registered Agent for Service of Process)  
3500 Wadley Place, Building B  
Austin, TX 78728

January 18, 2018

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On January 18, 2018 between 8:00 a.m. and 5:00 p.m. Eastern Time, 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 January 18, 2018 between 8:00 a.m. and 5:00 p.m. Eastern Time, 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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Eric J. Dobroth, Deputy District Attorney  
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Anne Marie Schubert, District Attorney  
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Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

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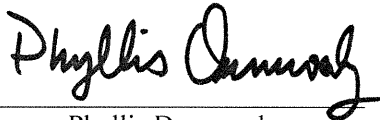
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On January 18, 2018 between 8:00 a.m. and 5:00 p.m. Eastern Time, I served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached 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 First Class Mail.

Executed on January 18, 2018, in Fort Oglethorpe, Georgia.



---

Phyllis Dunwoody

**Service List**

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