

# Agency D&L

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July 26, 2019

**Chief Executive Officer**  
**MedChemExpress LLC**  
1 Deer Park Dr, Suite Q  
Monmouth Junction, New Jersey 08852

Re: **60-DAY NOTICE OF VIOLATION OF CALIFORNIA LAW**  
**D&L File No. 61234.9**

Dear Executives of MedChemExpress LLC,

Your company is in violation of California's Proposition 65, "The Safe Drinking Water and Toxic Enforcement Act of 1986." We represent Maria Elizabeth Romero, a California resident and concerned citizen who intends to file suit against you in the public interest if this matter is not resolved within 60 days.

Enclosed with this letter for your information is a copy of a Proposition 65 Summary prepared by California's Office of Environmental Health Hazard Assessment.

MedChemExpress LLC ("MedChemExpress") sells high-purity chemical products directly to consumers via the Web site located at <https://www.MedChemExpress.com>. "Listed Chemicals" are those substances which the State of California has recognized as causing cancer, birth defects, or other reproductive harm. The following products are sold by MedChemExpress via the referenced Web site without adequate warning, in violation of the requirements of Proposition 65.

|                  |   |
|------------------|---|
| <b>PRODUCTS:</b> | <b>All products sold by MedChemExpress via the referenced Web site which contain a Listed Chemical in a purity of 10 percent or higher, whether in solid form or in solution.</b> |
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|----------------------------|---|
| <b>ROUTES OF EXPOSURE:</b> | <b>Dermal contact, ingestion and inhalation</b> |
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|---------------------------|--|
| <b>DATES OF EXPOSURE:</b> | <b>Between August 31, 2018 and July 26, 2019</b> |
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Since August 30, 2018, California law has required that a clear and reasonable warning be provided to consumers buying any product online which contains a Listed Chemical, prior to completion of the purchase. Manufacturers and distributors have primary responsibility for ensuring that compliant warnings are provided at all stages of the supply chain. Sales of the referenced products to educational institutions in California without adequate warnings have resulted in the exposure of individuals in the State to Listed Chemicals as described.

Enclosed with this letter as Attachments "B" and "C," respectively, are a non-exhaustive list of products sold by MedChemExpress in violation of Proposition 65, and a list of Listed Chemicals for which violations are alleged. Attachment B is provided for reference only and contains a list of example products offered for sale on the referenced site, which contain Listed Chemicals whose names begin with the letters A or B.

Your violation of California law exposes MedChemExpress to substantial civil liability. A court may impose penalties of up to \$2,500 *per day* for each violation. With more than 300 days having passed since regulations requiring online warnings became effective on August 31, 2018, and online offerings for hundreds of its products violating the law, MedChemExpress's potential liability is enormous.

The purpose of Proposition 65 is to protect the citizens of the State of California from unwitting exposure to reproductive harm and carcinogenic substances. Accordingly, private settlement of this matter will require your agreement to: (1) provide Proposition 65-compliant warnings to California residents prior to internet sales of products containing Listed Chemicals; and (2) require that any entity in the supply chain for consumer sales of your products also provide compliant warnings. Any settlement agreement will also contain an enforcement mechanism providing for substantial penalties in case of non-compliance.

Attached hereto is an executed Certificate of Merit regarding MedChemExpress's violation of Proposition 65 described above. The Attorney General of the State of California, all District Attorneys in the State, and City Attorneys for California cities with more than 750,000 residents have received a copy of this Notice and may bring suit against you within 60 days of the date of this Notice. Any settlement of the violations described above is subject to approval by the Attorney General of the State of California.

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To prevent the necessity of resolving this matter through litigation, we would be grateful for your prompt attention to these matters.

Very truly yours,



Benjamin D. Weston

Enclosures:

Proposition 65 Summary (MedChemExpress copy only)

Attachment B

Attachment C

Certificate of Merit

Statement of Facts (A.G. copy only)

Service List

CCs:

See Service List

## 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. The reader is directed to the statute and OEHHA 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.<sup>1</sup> 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

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<sup>1</sup> All further regulatory references are to sections of Title 27 of the California Code of Regulations unless otherwise indicated. The statute, regulations and relevant case law are available on the OEHHA website at: <http://www.oehha.ca.gov/prop65/law/index.html>.

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](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 make known 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 Period.*** 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.

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<sup>2</sup> See Section 25501(a)(4).

## *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 copy of the notice of special compliance procedure and proof of compliance form is included in Appendix B and can be downloaded from OEHHA's website at:  
<http://oehha.ca.gov/prop65/law/p65law72003.html>.

*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](mailto:P65Public.Comments@oehha.ca.gov).

Revised: May 2017

NOTE: Authority cited: Section 25249.12, Health and Safety Code. Reference: Sections 25249.5, 25249.6, 25249.7, 25249.9, 25249.10 and 25249.11, Health and Safety Code.



# Agency D&L

## MedChemExpress LLC Notice of Violation

July 26, 2019

### ATTACHMENT B PRODUCTS CONTAINING LISTED CHEMICALS

| PRODUCT AND URL   | LISTED CHEMICAL                              |
|---|--|
| 1. Abiraterone acetate, 99.97%, at <a href="https://www.medchemexpress.com/Abiraterone-acetate.html">https://www.medchemexpress.com/Abiraterone-acetate.html</a> .  | 1. Abiraterone acetate                       |
| 2. Acetazolamide, 99.87%, at <a href="https://www.medchemexpress.com/Acetazolamide.html">https://www.medchemexpress.com/Acetazolamide.html</a> .  | 2. Acetazolamide                             |
| 3. Acetohydroxamic acid, >98.0%, at <a href="https://www.medchemexpress.com/Acetohydroxamic-acid.html">https://www.medchemexpress.com/Acetohydroxamic-acid.html</a> .   | 3. Acetohydroxamic acid                      |
| 4. Actinomycin D, 99.89%, at <a href="https://www.medchemexpress.com/Actinomycin-D.html">https://www.medchemexpress.com/Actinomycin-D.html</a> .  | 4. Actinomycin D                             |
| 5. Aflatoxin G1, by inquiry only, at <a href="https://www.medchemexpress.com/aflatoxin-g1.html">https://www.medchemexpress.com/aflatoxin-g1.html</a> .  | 5. Aflatoxins                                |
| 6. Aflatoxin B1, by inquiry only, at <a href="https://www.medchemexpress.com/Aflatoxin_B1.html">https://www.medchemexpress.com/Aflatoxin_B1.html</a> .  | 6. Aflatoxins                                |
| 7. Retinoic acid, 98.36%, at <a href="https://www.medchemexpress.com/Retinoic-acid.html">https://www.medchemexpress.com/Retinoic-acid.html</a> .  | 7. All-trans retinoic acid                   |
| 8. Altretamine, 99.61%, at <a href="https://www.medchemexpress.com/Altretamine.html">https://www.medchemexpress.com/Altretamine.html</a> .  | 8. Altretamine                               |
| 9. Amantadine hydrochloride, >98.00%, at <a href="https://www.medchemexpress.com/Amantadine-hydrochloride.html">https://www.medchemexpress.com/Amantadine-hydrochloride.html</a> .                            | 9. Amantadine hydrochloride                  |
| 10. Amikacin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Amikacin-sulfate.html">https://www.medchemexpress.com/Amikacin-sulfate.html</a> .  | 10. Amikacin sulfate                         |
| 11. Bekanamycin, >98.0%, at <a href="https://www.medchemexpress.com/Bekanamycin.html">https://www.medchemexpress.com/Bekanamycin.html</a> .   | 11. Aminoglycosides                          |
| 12. Sisomicin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Sisomicin-sulfate.html">https://www.medchemexpress.com/Sisomicin-sulfate.html</a> .   | 12. Aminoglycosides                          |
| 13. Streptomycin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Streptomycin-sulfate.html">https://www.medchemexpress.com/Streptomycin-sulfate.html</a> .  | 13. Aminoglycosides                          |
| 14. Puromycin Dihydrochloride, 99.87%, at <a href="https://www.medchemexpress.com/Puromycin_Dihydrochloride.html">https://www.medchemexpress.com/Puromycin_Dihydrochloride.html</a> .                         | 14. Aminoglycosides                          |
| 15. Puromycin, by inquiry only, at <a href="https://www.medchemexpress.com/Puromycin.html">https://www.medchemexpress.com/Puromycin.html</a> .  | 15. Aminoglycosides                          |
| 16. Apramycin, by inquiry only, at <a href="https://www.medchemexpress.com/apramycin.html">https://www.medchemexpress.com/apramycin.html</a> .  | 16. Aminoglycosides                          |
| 17. Tobramycin, >98.0%, at <a href="https://www.medchemexpress.com/Tobramycin.html">https://www.medchemexpress.com/Tobramycin.html</a> .  | 17. Aminoglycosides                          |
| 18. Hygromycin B, >98.0%, at <a href="https://www.medchemexpress.com/Hygromycin-B.html">https://www.medchemexpress.com/Hygromycin-B.html</a> .  | 18. Aminoglycosides                          |
| 19. Framycetin, unspecified purity, at <a href="https://www.medchemexpress.com/Framycetin.html">https://www.medchemexpress.com/Framycetin.html</a> .  | 19. Aminoglycosides                          |
| 20. Neomycin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Neomycin-sulfate.html">https://www.medchemexpress.com/Neomycin-sulfate.html</a> .  | 20. Aminoglycosides                          |
| 21. Capreomycin sulfate, >99.0%, at <a href="https://www.medchemexpress.com/Capreomycin-sulfate.html">https://www.medchemexpress.com/Capreomycin-sulfate.html</a> .   | 21. Aminoglycosides                          |
| 22. Amikacin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Amikacin-sulfate.html">https://www.medchemexpress.com/Amikacin-sulfate.html</a> .  | 22. Aminoglycosides                          |
| 23. Apramycin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Apramycin-sulfate.html">https://www.medchemexpress.com/Apramycin-sulfate.html</a> .   | 23. Aminoglycosides                          |
| 24. Kanamycin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Kanamycin-sulfate.html">https://www.medchemexpress.com/Kanamycin-sulfate.html</a> .   | 24. Aminoglycosides                          |
| 25. Kasugamycin hydrochloride hydrate, 97.91%, at <a href="https://www.medchemexpress.com/Kasugamycin-hydrochloride-hydrate.html">https://www.medchemexpress.com/Kasugamycin-hydrochloride-hydrate.html</a> . | 25. Aminoglycosides                          |
| 26. Dihydrostreptomycin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Dihydrostreptomycin-sulfate.html">https://www.medchemexpress.com/Dihydrostreptomycin-sulfate.html</a> .                   | 26. Aminoglycosides                          |
| 27. Gentamicin sulfate, by inquiry only, at <a href="https://www.medchemexpress.com/Gentamicin_sulfate_.html">https://www.medchemexpress.com/Gentamicin_sulfate_.html</a> .                                   | 27. Aminoglycosides                          |
| 28. G-418 disulfate, >98.0%, at <a href="https://www.medchemexpress.com/G-418-disulfate.html">https://www.medchemexpress.com/G-418-disulfate.html</a> .   | 28. Aminoglycosides                          |
| 29. Netilmicin sulfate, >98.0%, at <a href="https://www.medchemexpress.com/Netilmicin-sulfate.html">https://www.medchemexpress.com/Netilmicin-sulfate.html</a> .  | 29. Aminoglycosides                          |
| 30. Amiodarone hydrochloride, 99.82%, at <a href="https://www.medchemexpress.com/Amiodarone-hydrochloride.html">https://www.medchemexpress.com/Amiodarone-hydrochloride.html</a> .                            | 30. Amiodarone hydrochloride                 |
| 31. Amitraz, >98.0%, at <a href="https://www.medchemexpress.com/Amitraz.html">https://www.medchemexpress.com/Amitraz.html</a> .   | 31. Amitraz                                  |
| 32. Amoxapine, 98.70%, at <a href="https://www.medchemexpress.com/Amoxapine.html">https://www.medchemexpress.com/Amoxapine.html</a> .   | 32. Amoxapine                                |
| 33. Amsacrine, 99.98%, at <a href="https://www.medchemexpress.com/Amsacrine.html">https://www.medchemexpress.com/Amsacrine.html</a> .   | 33. Amsacrine                                |
| 34. Boldenone Cypionate, by inquiry only, at <a href="https://www.medchemexpress.com/boldenone-cypionate.html">https://www.medchemexpress.com/boldenone-cypionate.html</a> .                                  | 34. Anabolic steroids                        |
| 35. Stanolone benzoate, by inquiry only, at <a href="https://www.medchemexpress.com/stanolone-benzoate.html">https://www.medchemexpress.com/stanolone-benzoate.html</a> .                                     | 35. Anabolic steroids                        |
| 36. Nandrolone propionate, by inquiry only, at <a href="https://www.medchemexpress.com/nandrolone-propionate.html">https://www.medchemexpress.com/nandrolone-propionate.html</a> .                            | 36. Anabolic steroids                        |
| 37. Phenacetin, 99.09%, at <a href="https://www.medchemexpress.com/phenacetin.html">https://www.medchemexpress.com/phenacetin.html</a> .  | 37. Analgesic mixtures containing phenacetin |

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MedChemExpress LLC, Attachment B, pg. 2

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| PRODUCT AND URL  | LISTED CHEMICAL                                    |
|--|--|
| 38. 35 ACE inhibitors.   | 38. Angiotensin converting enzyme (ACE) inhibitors |
| 39. Anisindione, 99.03%, at <a href="https://www.medchemexpress.com/Anisindione.html">https://www.medchemexpress.com/Anisindione.html</a> .  | 39. Anisindione                                    |
| 40. Aristolochic acid A, 99.98%, at <a href="https://www.medchemexpress.com/aristolochic-acid-a.html">https://www.medchemexpress.com/aristolochic-acid-a.html</a> .                      | 40. Aristolochic acids                             |
| 41. Aspirin, >99.0%, at <a href="https://www.medchemexpress.com/aspirin.html">https://www.medchemexpress.com/aspirin.html</a> .  | 41. Aspirin  |
| 42. Atenolol, >98.0%, at <a href="https://www.medchemexpress.com/atenolol.html">https://www.medchemexpress.com/atenolol.html</a> .   | 42. Atenolol                                       |
| 43. Auranofin, >98.0%, at <a href="https://www.medchemexpress.com/Auranofin.html">https://www.medchemexpress.com/Auranofin.html</a> .  | 43. Auranofin                                      |
| 44. Avermectin B1, >97.0%, at <a href="https://www.medchemexpress.com/Avermectin-B1.html">https://www.medchemexpress.com/Avermectin-B1.html</a> .  | 44. Avermectin B1 (Abamectin)                      |
| 45. 5-Azacytidine, 99.97%, at <a href="https://www.medchemexpress.com/5-Azacytidine.html">https://www.medchemexpress.com/5-Azacytidine.html</a> .  | 45. Azacitidine                                    |
| 46. Azaserine, 99.91%, at <a href="https://www.medchemexpress.com/Azaserine.html">https://www.medchemexpress.com/Azaserine.html</a> .  | 46. Azaserine                                      |
| 47. Azathioprine, 99.87%, at <a href="https://www.medchemexpress.com/Azathioprine.html">https://www.medchemexpress.com/Azathioprine.html</a> .   | 47. Azathioprine                                   |
| 48. Azobenzene, >98.0%, at <a href="https://www.medchemexpress.com/Azobenzene.html">https://www.medchemexpress.com/Azobenzene.html</a> .   | 48. Azobenzene                                     |
| 49. Beclometasone dipropionate, 99.92%, at <a href="https://www.medchemexpress.com/Beclometasone-dipropionate.html">https://www.medchemexpress.com/Beclometasone-dipropionate.html</a> . | 49. Beclomethasone dipropionate                    |
| 50. Benzo[a]pyrene, 99.13%, at <a href="https://www.medchemexpress.com/Benzo-a-pyrene.html">https://www.medchemexpress.com/Benzo-a-pyrene.html</a> .                                     | 50. Benzo[a]pyrene                                 |
| 51. Carmustine, 99.85%, at <a href="https://www.medchemexpress.com/Carmustine.html">https://www.medchemexpress.com/Carmustine.html</a> .   | 51. Bischloroethyl nitrosourea (BCNU) (Carmustine) |
| 52. Busulfan, >98.0%, at <a href="https://www.medchemexpress.com/busulfan.html">https://www.medchemexpress.com/busulfan.html</a> .   | 52. 1,4-Butanediol dimethanesulfonate (Busulfan)   |
| 53. Butylhydroxyanisole, >99.0%, at <a href="https://www.medchemexpress.com/Butylhydroxyanisole.html">https://www.medchemexpress.com/Butylhydroxyanisole.html</a> .                      | 53. Butylated hydroxyanisole                       |

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## MedChemExpress LLC Notice of Violation

July 26, 2019

### Attachment C: Listed Chemicals

|   |   |  |
|---|---|--|
| A-alpha-C (2-Amino-9H-pyrido[2,3-b]indole)              | Benz[a]anthracene   | Chlordiazepoxide   |
| Abiraterone acetate                                     | Benzene   | Chlordiazepoxide hydrochloride   |
| Acetaldehyde  | Benzidine [and its salts]                                     | Chlordimeform  |
| Acetamide   | Benzidine-based dyes  | Chlorendic acid  |
| Acetazolamide   | Benzodiazepines   | Chlorinated paraffins (Average chain length, C12; approximately 60 percent chlorine by weight) |
| Acetochlor  | Benzo[b]fluoranthene  | P-Chloroaniline-Chloroaniline  |
| Acetohydroxamic acid                                    | Benzo[k]fluoranthene  | p-Chloroaniline hydrochloride-p-Chloroaniline hydrochloride                                    |
| 2-Acetylaminofluorene                                   | Benzo[k]fluoranthene  | Chloroethane (Ethyl chloride)  |
| Acifluorfen sodium                                      | Benzofuran  | 1-(2-Chloroethyl)-3-cyclohexyl-1-nitrosourea (CCNU) (Lomustine)                                |
| Acrylamide  | Benzophenone  | 1-(2-Chloroethyl)-3-(4-methylcyclohexyl)-1-nitrosourea (Methyl-CCNU)                           |
| Acrylonitrile   | Benzo[a]pyrene  | Chloroform   |
| Actinomycin D   | Benzotrichloride  | Chloromethyl methyl ether (technical grade)  |
| AF-2;[2-(2-furyl)-3-(5-nitro-2-furyl)]acrylamide        | Benzphetamine hydrochloride                                   | 3-Chloro-2-methylpropene   |
| Aflatoxins  | Benzyl chloride   | 1-Chloro-4-nitrobenzene  |
| Alachlor  | Benzyl violet 4B  | 4-Chloro-o-phenylenediamine  |
| Alcoholic beverages                                     | Beryllium and beryllium compounds                             | Chloroprene  |
| Alcoholic beverages, when associated with alcohol abuse | Betel quid with tobacco                                       | 2-Chloropropionic acid   |
| Aldrin  | Betel quid without tobacco                                    | Chlorothalonil   |
| All-trans retinoic acid                                 | Bevacizumab   | P-Chloro-o-toluidine   |
| Aloe Vera, non-decolorized whole leaf extract           | 2,2-Bis(bromomethyl)-1,3-propanediol                          | p-Chloro-o-toluidine, strong acid salts of p-Chloro-o-toluidine                                |
| Alprazolam  | Bis(2-chloroethyl)ether                                       | 5-Chloro-o-toluidine and its strong acid salts   |
| Altretamine   | N,N-Bis(2-chloroethyl)-2-naphthylamine (Chlornapazine)        | Chlorotrianisene   |
| Amantadine hydrochloride                                | Bis(chloroethyl nitrosourea (BCNU) (Carmustine)               | p-chloro- $\alpha,\alpha,\alpha$ -trifluorotoluene (para-Chlorobenzotrifluoride, PCBTF)        |
| Amikacin sulfate  | Bis(2-chloro-1-methylethyl)ether, technical grade             | Chlorozotocin  |
| 2-Aminoanthraquinone                                    | Bisphenol A (BPA)   | Chlorpyrifos   |
| P-Aminoazobenzene                                       | Bitumens, extracts of steam-refined and air refined           | Chromium (hexavalent compounds)  |
| O-Aminoazotoluene                                       | Bracken fern  | Chrysene   |
| 4-Aminobiphenyl (4-aminodiphenyl)                       | Bromacil lithium salt   | C.I. Acid Red 114  |
| 1-Amino-2,4-dibromoanthraquinone                        | Bromate   | C.I. Basic Red 9 monohydrochloride   |
| 3-Amino-9-ethylcarbazole hydrochloride                  | Bromochloroacetic acid  | C.I. Direct Blue 15  |
| 2-Aminoanthraquinone                                    | Bromodichloroacetic acid                                      | C.I. Direct Blue 218   |
| Aminoglutethimide                                       | Bromodichloromethane  | C.I. Disperse Yellow 3   |
| Aminoglycosides   | Bromoethane   | C.I. Solvent Yellow 14   |
| 1-Amino-2-methylantraquinone                            | Bromoform   | Ciclosporin (Cyclosporin A; Cyclosporine)  |
| 2-Amino-5-(5-nitro-2-furyl)-1,3,4-thiadiazole           | 1-Bromopropane (1-BP)   | Cidofovir  |
| Amino-2-nitrophenol                                     | 2-Bromopropane (2-BP)   | Cinnamyl anthranilate  |
| Aminopterin   | Bromoxynil  | Cisplatin  |
| Amiodarone hydrochloride                                | Bromoxynil octanoate  | Citrus Red No. 2   |
| Amitraz   | Butabarbital sodium   | Cladribine   |
| Amitrole  | 1,3-Butadiene   | Clarithromycin   |
| Amoxapine   | 1,4-Butanediol dimethanesulfonate (Busulfan)                  | Clobetasol propionate  |
| Amsacrine   | Butylated hydroxyanisole                                      | Clofibrate   |
| Anabolic steroids                                       | Butyl benzyl phthalate (BBP)d                                 | Clomiphene citrate   |
| Analgesic mixtures containing Phenacetin                | beta-Butyrolactone  | Clorazepate dipotassium  |
| Androstenedione   | Cacodylic acid  | CMNP (pyrazachlor)   |
| Angiotensin converting enzyme (ACE) inhibitors          | Cadmium   | Cobalt metal powder  |
| Aniline   | Cadmium and cadmium compounds                                 | Cobalt [II] oxide  |
| Aniline hydrochloride                                   | Caffeic acid  | Cobalt sulfate   |
| o-Anisidine-o-Anisidine                                 | Captadol  | Cobalt sulfate heptahydrate  |
| o-Anisidine hydrochloride                               | Captan  | Cocaine  |
| Anisindione   | Carbamazepine   | Coconut oil diethanolamine condensate (cocamide diethanolamine)                                |
| Antraquinone  | Carbaryl  | Codeine phosphate  |
| Antimony oxide (Antimony trioxide)                      | Carbazole   | Coke oven emissions  |
| Aramite   | Carbon black (airborne, unbound particles of respirable size) | Colchicine   |
| Areca nut   | Carbon-black extracts   | Conjugated estrogens   |
| Aristolochic acids                                      | Carbon disulfide  | Creosotes  |
| Arsenic (inorganic arsenic compounds)                   | Carbon monoxide   | p-Cresidine  |
| Arsenic (inorganic oxides)                              | Carbon tetrachloride  | Cumene   |
| Asbestos  | Carboplatin   | Cupferron  |
| Aspirin   | N-Carboxymethyl-N-nitrosourea                                 | Cyanazine  |
| Atenolol  | Catechol  | Cycasin  |
| Atrazine  | Ceramic fibers (airborne particles of respirable size)        | Cycloate   |
| Auramine  | Certain combined chemotherapy for lymphomas                   | Cycloheximide  |
| Auranofin   | Chenodiol   | Cyclopenta[cd]pyrene   |
| Avermectin B1 (Abamectin)                               | Chloral   | Cyclophosphamide (anhydrous)   |
| Azacitidine   | Chloral hydrate   | Cyclophosphamide (hydrated)  |
| Azaserine   | Chlorambucil  | Cyhexatin  |
| Azathioprine  | Chloramphenicol sodium succinate                              |  |
| Azobenzene  | Chlorcyclizine hydrochloride                                  |  |
| Barbiturates  | Chlordane   |  |
| Beclomethasone dipropionate                             | Chlordecone (Kepone)  |  |
| Benomyl   |   |  |
| Benthiavalicarb-isopropyl                               |   |  |

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| Cytarabine   | Diltiazem hydrochloride  | Ethylbenzene                                      |
| Cytembena  | 3,3'-Dimethoxybenzidine (o-Dianisidine)  | Ethyl dipropylthiocarbamate                       |
| D&C Orange No. 17                                  | 3,3'-Dimethoxybenzidine dihydrochloride  | Ethyl-4,4'-dichlorobenzilate                      |
| D&C Red No. 8                                      | 3,3'-Dimethoxybenzidine-based dyes metabolized to                                  | Ethylene dibromide                                |
| D&C Red No. 9                                      | 3,3'-dimethoxybenzidine  | Ethylene dichloride (1,2-Dichloroethane)          |
| D&C Red No. 19                                     | 4-Dimethylaminoazobenzene  | Ethylene glycol (ingested)                        |
| Dacarbazine  | trans-2-[(Dimethylamino)methylimino]-5-[2-(5-nitro-2-furyl)vinyl]-1,3,4-oxadiazole | Ethylene glycol monoethyl ether                   |
| Daminozide   | 7,12-Dimethylbenz(a)anthracene   | Ethylene glycol monoethyl ether acetate           |
| Danazol  | 3,3'-Dimethylbenzidine (ortho-Tolidine)  | Ethyleneimine (Aziridine)                         |
| Dantron (Chrysazin; 1,8-Dihydroxyanthraquinone)    | 3,3'-Dimethylbenzidine-based dyes metabolized to                                   | Ethylene oxide                                    |
| Daunomycin   | 3,3'-dimethylbenzidine   | Ethylene thiourea                                 |
| Daunorubicin hydrochloride                         | 3,3'-Dimethylbenzidine dihydrochloride   | Ethyl methanesulfonate                            |
| DDD (Dichlorodiphenyl-dichloroethane)              | Dimethylcarbamoyl chloride   | Etodolac  |
| DDE (Dichlorodiphenyl-dichloroethylene)            | N,N-Dimethylformamide  | Etoposide   |
| DDT (Dichlorodiphenyl-trichloroethane)             | 1,1-Dimethylhydrazine (UDMH)   | Etoposide in combination with cisplatin and       |
| o,p'-DDT   | 1,2-Dimethylhydrazine  | bleomycin   |
| p,p'-DDT   | 2,6-Dimethyl-N-nitrosomorpholine (DMNM)  | Etretinate  |
| DDVP (Dichlorvos)                                  | Dimethyl sulfate   | Fenoxaprop ethyl                                  |
| Demeclocycline hydrochloride (internal use)        | N,N-Dimethyl-p-toluidineN  | Fenoxycarb  |
| Des-ethyl atrazine (DEA)                           | Dimethylvinylchloride  | Filgrastim  |
| Des-isopropyl atrazine (DIA)                       | Di-n-butyl phthalate (DBP)   | Fluazifop butyl                                   |
| N,N'-Diacetylbenzidine                             | Di-n-hexyl phthalate (DnHP)  | Flunisolide                                       |
| 2,4-Diaminoanisole                                 | M-Dinitrobenzenem  | Fluorouracil                                      |
| 2,4-Diaminoanisole sulfate                         | O-Dinitrobenzeneo-Dinitrobenzene   | Fluoxymesterone                                   |
| 2,4-Diamino-6-chloro-s-triazine (DACT)             | P-Dinitrobenzenep-Dinitrobenzene   | Flurazepam hydrochloride                          |
| 4,4'-Diaminodiphenyl ether (4,4'-Oxydianiline)     | 3,7-Dinitrofluoranthene  | Flurbiprofen                                      |
| 2,4-Diaminotoluene                                 | 3,9-Dinitrofluoranthene  | Flutamide   |
| Diazepam   | 1,3-Dinitropyrene  | Fluticasone propionate                            |
| Diazoaminobenzene                                  | 1,6-Dinitropyrene  | Fluvalinate                                       |
| Diazoxide  | 1,8-Dinitropyrene  | Folpet  |
| Dibenz[a,h]acridine                                | 2,4-Dinitrotoluene   | Formaldehyde (gas)                                |
| Dibenz[a,j]acridine                                | 2,6-Dinitrotoluene   | 2-(2-Formylhydrazino)-4-(5-nitro-2-furyl)thiazole |
| Dibenzanthracenes                                  | Dinitrotoluene (technical grade)   | Fumonisin B (1FumonisinB1)                        |
| Dibenz[a,c]anthracene                              | Dinitrotoluene mixture, 2,4-/2,6-  | Furan   |
| Dibenz[a,h]anthracene                              | Dinocap  | Furazolidone                                      |
| Dibenz[a,j]anthracene                              | Dinoseb  | Furfuryl alcohol                                  |
| 7H-Dibenzo[c,g]carbazole                           | Di-n-propyl isocinchomerionate (MGK Repellent                                      | Furmecycloz                                       |
| Dibenzo[a,e]pyrene                                 | 326)Di-n-propyl isocinchomerionate (MGK Repellent                                  | Fusarin C   |
| Dibenzo[a,h]pyrene                                 | 326)Di-n-propyl isocinchomerionate (MGK Repellent                                  | Gallium arsenide                                  |
| Dibenzo[a,i]pyrene                                 | 326)   | Ganciclovir                                       |
| Dibromoacetic acid                                 | 1,4-Dioxane  | Ganciclovir sodium                                |
| Dibromoacetonitrile                                | Diphenylhydantoin (Phenytoin)  | Gasoline engine exhaust (condensates/extracts)    |
| 1,2-Dibromo-3-chloropropane (DBCP)                 | Diphenylhydantoin (Phenytoin), sodium salt   | Gemfibrozil                                       |
| 2,3-Dibromo-1-propanol                             | Direct Black 38 (technical grade)  | Gentian violet (Crystal violet)                   |
| Dichloroacetic acid                                | Direct Blue 6 (technical grade)  | Glass wool fibers (inhalable and biopersistent)   |
| P-Dichlorobenzenep-Dichlorobenzene                 | Direct Brown 95 (technical grade)  | Glu-P-1 (2-Amino-6-methyldipyrro[1,2- a:3',2'-    |
| 3,3'-Dichlorobenzidine                             | Disodium cyanodithioimidocarbonate   | d]imidazole)                                      |
| 3,3'-Dichlorobenzidine dihydrochloride             | Disperse Blue 1  | Glu-P-2 (2-Aminodipyrro[1,2-a:3',2'-d]imidazole)  |
| 1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene (DDE) | Diuron   | Glycidaldehyde                                    |
| 1,4-Dichloro-2-butene                              | Doxorubicin hydrochloride (Adriamycin)   | Glycidol  |
| 3,3'-Dichloro-4,4'-diamino-diphenyl ether          | Doxycycline (internal use)   | Glyphosate  |
| 1,1-Dichloroethane                                 | Doxycycline calcium (internal use)   | Goldenseal root powder                            |
| Dichloromethane (Methylene chloride)               | Doxycycline hyclate (internal use)   | Goserelin acetate                                 |
| Dichlorophene                                      | Doxycycline monohydrate (internal use)   | Griseofulvin                                      |
| Dichlorophenamide                                  | Emissions from combustion of coal  | Gyromitrin (Acetaldehyde methylformylhydrazone)   |
| 1,2-Dichloropropane                                | Emissions from high-temperature unrefined  | Halazepam   |
| 1,3-Dichloro-2-propanol (1,3-DCP)                  | rapeseed oil   | Halobetasol propionate                            |
| 1,3-Dichloropropene                                | Endrin   | Haloperidol                                       |
| Diclofop-methyl                                    | Environmental tobacco smoke (ETS)  | Halothane   |
| Diclofop methyl                                    | Epichlorohydrin  | HC Blue 1   |
| Dicumarol  | Epoxiconazole  | Heptachlor  |
| Dieldrin   | Ergotamine tartrate  | Heptachlor epoxide                                |
| Diepoxybutane                                      | Erionite   | Herbal remedies containing plant species of the   |
| Diesel engine exhaust                              | Estradiol 17B  | genus Aristolochia                                |
| Diethanolamine                                     | Estragole  | Hexachlorobenzene                                 |
| Di(2-ethylhexyl)phthalate (DEHP)                   | Estrogens, steroidal   | Hexachlorobutadiene                               |
| 1,2-Diethylhydrazine                               | Estrogen-progestogen (combined) used as  | Hexachlorocyclohexane (technical grade)           |
| Diethylstilbestrol (DES)                           | menopausal therapy   | Hexachlorocyclohexane (alpha isomer)              |
| Diethyl sulfate                                    | Estrone  | Hexachlorocyclohexane (beta isomer)               |
| Diflunisal   | Estropipate  | Hexachlorocyclohexane (gamma isomer)              |
| Diglycidyl resorcinol ether (DGRE)                 | Ethinylestradiol   | Hexachlorodibenzodioxin                           |
| Dihydroergotamine mesylate                         | Ethionamide  | Hexachloroethane                                  |
| Dihydrosafole                                      | Ethoprop   | 2,4-Hexadienal (89% trans, trans isomer; 11% cis, |
| Di-isodecyl phthalate (DIDP)                       | Ethyl acrylate   | trans isomer)                                     |
| Diisononyl phthalate (DINP)                        | Ethyl alcohol in alcoholic beverages   | Hexafluoroacetone                                 |
| Diisopropyl sulfate                                |  | Hexamethylphosphoramide                           |

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| N-Hexane   | 8-Methoxypsoralen with ultraviolet A therapy                           | Nickel oxide   |
| 2,5-Hexanedione  | 2-Methylaziridine (Propyleneimine)                                     | Nickel refinery dust from the pyrometallurgical process                  |
| Histrelin acetate                                      | Methylazoxymethanol  | Nickel subsulfide  |
| Hydramethylnon   | Methylazoxymethanol acetate  | Nicotine   |
| Hydrazine  | Methyl bromide, as a structural fumigant                               | Nifedipine   |
| Hydrazine sulfate                                      | Methyl carbamate   | Nimodipine   |
| Hydrazobenzene (1,2-Diphenylhydrazine)                 | Methyl chloride  | Niridazole   |
| Hydrogen cyanide (HCN) and cyanide salts (CN salts)    | 3-Methylcholanthrene   | Nitrapyrin   |
| 1-Hydroxyanthraquinone                                 | 5-Methylchrysene   | Nitrilotriacetic acid  |
| Hydroxyurea  | 4,4'-Methylene bis(2-chloroaniline)                                    | Nitrilotriacetic acid, trisodium salt monohydrate                        |
| Idarubicin hydrochloride                               | 4,4'-Methylene bis(N,N-dimethyl)benzenamine                            | 5-Nitroacenaphthene  |
| Ifosfamide   | 4,4'-Methylene bis(2-methylaniline)                                    | o-Nitroanisoleo-Nitroanisoleo-Nitroanisoleo-Nitroanisoleo-Nitroanisole   |
| Iodine-131   | 4,4'-Methylenedianiline  | Nitrobenzene   |
| Imazalil   | 4,4'-Methylenedianiline dihydrochloride                                | 4-Nitrobiphenyl  |
| Indeno[1,2,3-cd]pyrene                                 | Methyleugenol  | 6-Nitrochrysene  |
| Indium phosphide                                       | Methylhydrazine and its salts  | Nitrofen (technical grade)   |
| IQ (2-Amino-3-methylimidazo[4,5-f] quinoline)          | Methylhydrazine  | 2-Nitrofluorene  |
| Iprodione  | Methylhydrazine sulfate  | Nitrofurantoin   |
| Iprovalicarb   | 2-Methylimidazole  | Nitrofurazone  |
| Iron dextran complex                                   | 4-Methylimidazole  | 1-[(5-Nitrofurfurylidene)-amino]-2-imidazolidinone                       |
| Isobutyl nitrite                                       | Methyl iodide  | N-[4-(5-Nitro-2-furyl)-2-thiazolyl]acetamide                             |
| Isoprene   | Methyl isobutyl ketone   | Nitrogen mustard (Mechlorethamine)                                       |
| Isoprazam  | Methyl isobutyl ketone (MIBK)  | Nitrogen mustard hydrochloride (Mechlorethamine hydrochloride)           |
| Isotretinoin   | Methyl isocyanate (MIC)  | Nitrogen mustard N-oxide   |
| Isoxaflutole   | Methyl mercury   | Nitrogen mustard N-oxide hydrochloride                                   |
| Kresoxim-methyl  | Methylmercury compounds  | Nitromethane   |
| Lactofen   | Methyl methanesulfonate  | 2-Nitropropane   |
| Lasiocarpine   | Methyl-n-butyl ketone  | 1-Nitropyrene  |
| Lead   | 2-Methyl-1-nitroanthraquinone (of uncertain purity)                    | 4-Nitropyrene  |
| Lead and lead compounds                                | N-Methyl-N'-nitro-N-nitrosoguanidine                                   | N-Nitrosodi-n-butylamineN-Nitrosodi-n-butylamineN-Nitrosodi-n-butylamine |
| Lead acetate   | N-Methylolacrylamide   | N-Nitrosodiethanolamine  |
| Lead phosphate   | N-Methylpyrrolidone  | N-Nitrosodiethylamine  |
| Lead subacetate  | α-Methyl styrene (alpha-Methylstyrene)                                 | N-Nitrosodimethylamine   |
| Leather dust   | Methyltestosterone   | p-Nitrosodiphenylaminep-Nitrosodiphenylaminep-Nitrosodiphenylamine       |
| Leuprolide acetate                                     | Methylthiouracil   | N-Nitrosodiphenylamine   |
| Levodopa   | Metiram  | N-Nitrosodiphenylamine   |
| Levonorgestrel implants                                | Metronidazole  | N-Nitrosodi-n-propylamineN-Nitrosodi-n-propylamine                       |
| Lindane and other hexachlorocyclohexane isomers        | Michler's ketone   | N-Nitroso-N-ethylurea  |
| Linuron  | Midazolam hydrochloride  | N-Nitrosohexamethyleneimine  |
| Lithium carbonate                                      | Minocycline hydrochloride (internal use)                               | 3-(N-Nitrosomethylamino) propionitrile                                   |
| Lithium citrate  | Mirex  | 4-(N-Nitrosomethylamino)-1-(3-pyridyl)-1-butanone                        |
| Lorazepam  | Misoprostol  | N-Nitrosomethyl-n-butylamine   |
| Lovastatin   | Mitomycin C  | N-Nitrosomethyl-n-decylamine   |
| Lynestrenol  | Mitoxantrone hydrochloride   | N-Nitrosomethyl-n-dodecylamine   |
| Malathion  | Molinate   | N-Nitrosomethylethylamine  |
| Malonaldehyde, sodium salt                             | MON 4660 (dichloroacetyl-1-oxa-4-azaspiro(4,5)-decane                  | N-Nitrosomethyl-n-heptylamine  |
| Mancozeb   | MON 13900 (furalazole)   | N-Nitrosomethyl-n-hexylamine   |
| Maneb  | 3-Monochloropropane-1,2-diol (3-MCPD)                                  | N-Nitrosomethyl-n-nonylamine   |
| Marijuana smoke  | Monocrotaline  | N-Nitrosomethyl-n-octylamine   |
| Me-A-alpha-C (2-Amino-3-methyl-9H-pyrido[2,3-b]indole) | MOPP (vincristine-prednisone-nitrogen mustard-procarbazine mixture)    | N-Nitrosomethyl-n-pentylamine  |
| Mebendazole  | 5-(Morpholinomethyl)-3-[(5-nitrofurfuryl-idene)-amino]-2-oxazolidinone | N-Nitrosomethyl-n-propylamine  |
| Medroxyprogesterone acetate                            | Mustard Gas  | N-Nitrosomethyl-n-tetradecylamine  |
| Megestrol acetate                                      | MX (3-chloro-4-dichloromethyl-5-hydroxy-2(5H)-furanone)                | N-Nitrosomethyl-n-undecylamine   |
| MeIQ (2-Amino-3,4-dimethylimidazo[4,5-f]quinoline)     | Myclobutanil   | N-Nitroso-N-methylurea   |
| MeIQx (2-Amino-3,8-dimethylimidazo[4,5-f]quinoxaline)  | beta-Myrcene   | N-Nitroso-N-methylurethane   |
| Melphalan  | Nabam  | N-Nitrosomethylvinylamine  |
| Menotropins  | Nafarelin acetate  | N-Nitrosomorpholine  |
| Mepaniprim   | Nafenopin  | N-Nitrososarcosine   |
| Meprobamate  | Nalidixic acid   | o-Nitrotoluene   |
| 2-Mercaptobenzothiazole                                | Naphthalene  | Nitrous oxide  |
| Mercaptopurine   | 1-Naphthylamine  | Norethisterone (Norethindrone)   |
| Mercury and mercury compounds                          | 2-Naphthylamine  | Norethisterone acetate (Norethindrone acetate)                           |
| Merphalan  | Neomycin sulfate (internal use)  | Norethisterone (Norethindrone) /Ethinyl estradiol                        |
| Mestranol  | Netilmicin sulfate   | Norethisterone (Norethindrone) /Mestranol                                |
| Metam potassium  | Nickel (Metallic)  | Norethynodrel  |
| Methacycline hydrochloride                             | Nickel acetate   | Norgestrel   |
| Metham sodium  | Nickel carbonate   | Ochratoxin A   |
| Methanol   | Nickel carbonyl  | Oil Orange SS  |
| Methazole  | Nickel compounds   |  |
| Methimazole  | Nickel (soluble compounds)   |  |
| Methotrexate   | Nickel hydroxide   |  |
| Methotrexate sodium                                    | Nickel iodide  |  |
| 5-Methoxypsoralen with ultraviolet A therapy           | Nickelocene  |  |

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| Oral contraceptives, combined  | Propazine   | Thioacetamide   |
| Oral contraceptives, sequential  | beta-Propiolactone  | 4,4'-Thiodianiline  |
| Oryzalin   | Propoxur  | Thiodicarb  |
| Oxadiazon  | Propylene glycol mono-t-butyl ether   | Thioguanine   |
| Oxazepam   | Propylene oxide   | Thiophanate methyl  |
| Oxydemeton methyl  | Propylthiouracil  | Thiouracil  |
| Oxymetholone   | Pulegone  | Thiourea  |
| Oxymetholone   | Pymetrozine   | Thorium dioxide   |
| Oxytetracycline (internal use)   | Pyridine  | Titanium dioxide (airborne, unbound particles of respirable size)           |
| Oxytetracycline hydrochloride (internal use)   | Pyrimethamine   | Tobacco, oral use of smokeless products                                     |
| Oxythioquinox (Chinomethionat)   | Quazepam  | Tobacco smoke   |
| Paclitaxel   | Quinoline and its strong acid salts   | Tobacco smoke (primary)   |
| Palygorskite fibers (> 5µm in length)  | Quizalofop-ethyl  | Tobramycin sulfate  |
| Panfuran S   | Radionuclides   | Toluene   |
| Paramethadione   | Reserpine   | Toluene diisocyanate  |
| Parathion  | Residual (heavy) fuel oils  | o-Toluidineo-Toluidineo-Toluidine   |
| Penicillamine  | Resmethrin  | o-Toluidine hydrochlorideo-Toluidine hydrochlorideo-Toluidine hydrochloride |
| pentabromodiphenyl ether mixture [DE-71 (technical grade)]                             | Retinol/retinyl esters, when in daily dosages in excess of 10,000 IU, or 3,000 retinol equivalents. | Topiramate  |
| Pentachlorophenol  | Ribavirin   | Toxaphene (Polychlorinated camphenes)                                       |
| Pentachlorophenol and by-products of its synthesis (complex mixture)                   | Riddelline  | Toxins derived from Fusarium moniliforme (Fusarium verticillioides)         |
| Pentobarbital sodium   | Rifampin  | Treosulfan  |
| Pentosan polysulfate sodium  | Safrole   | Triadimefon   |
| Pentostatin  | Salted fish, Chinese-style  | Triamterene   |
| Perfluorooctane sulfonate (PFOS)   | Secobarbital sodium   | Triazolam   |
| Perfluorooctanoic acid (PFOA)  | Sedaxane  | S, S, S-Tributyl phosphorotrithioate (Tribufos, DEF)                        |
| Pertuzumab   | Selenium sulfide  | Tributyltin methacrylate  |
| Phenacetide  | Sermorelin acetate  | Trichlormethine (Trimustine hydrochloride)                                  |
| Phenacetin   | Shale-oils  | Trichloroacetic acid  |
| Phenazopyridine  | Silica, crystalline (airborne particles of respirable size)   | Trichloroethylene   |
| Phenazopyridine hydrochloride  | Simazine  | 2,4,6-Trichlorophenol   |
| Phenesterin  | Sodium dimethyldithiocarbamate  | 1,2,3-Trichloropropane  |
| Phenobarbital  | Sodium fluoroacetate  | Trientine hydrochloride   |
| Phenolphthalein  | Soots, tars, and mineral oils (untreated and mildly treated oils and used engine oils)              | Triforine   |
| Phenoxybenzamine   | Spirodiclofen   | Trilostane  |
| Phenoxybenzamine hydrochloride   | Spironolactone  | Trimethadione   |
| Phenprocoumon  | Stanozolol  | 2,4,5-Trimethylaniline and its strong acid salts                            |
| o-Phenylenediamine and its salts   | Sterigmatocystin  | Trimethyl phosphate   |
| Phenyl glycidyl ether  | Streptomycin sulfate  | Trimetrexate glucuronate  |
| Phenylhydrazine and its salts  | Streptozocin (streptozotocin)   | TRIM® VX  |
| o-Phenylphenate, sodiumo-Phenylphenate, sodiumo-Phenylphenate, sodium                  | Streptozotocin (streptozocin)   | 2,4,6-Trinitrotoluene (TNT)   |
| o-Phenylphenolo-Phenylphenolo-Phenylphenol   | Strong inorganic acid mists containing sulfuric acid  | Triphenyltin hydroxide  |
| Phenylphosphine  | Styrene   | Tris(1-aziridinyl)phosphine sulfide (Thiotepa)                              |
| PhiP(2-Amino-1-methyl-6-phenylimidazol[4,5-b]pyridine)                                 | Styrene oxide   | Tris(2-chloroethyl) phosphate   |
| Pimozide   | Sulfallate  | Tris(2,3-dibromopropyl)phosphate  |
| Pioglitazone   | Sulfasalazine (Salicylazosulfapyridine)   | Tris(1,3-dichloro-2-propyl) phosphate (TDCPP)                               |
| Pipobroman   | Sulfur dioxide  | Trp-P-1 (Tryptophan-P-1)  |
| Pirimicarb   | Sulindac  | Trypan blue (commercial grade)  |
| Plicamycin   | Talc containing asbestiform fibers  | Unleaded gasoline (wholly vaporized)  |
| Polybrominated biphenyls   | Tamoxifen and its salts   | Uracil mustard  |
| Polychlorinated biphenyls  | Tamoxifen citrate   | Urethane (Ethyl carbamate)  |
| Polychlorinated biphenyls (containing 60 or more percent chlorine by molecular weight) | Temazepam   | Urofollitropin  |
| Polychlorinated dibenzo-p-dioxinsPolychlorinated dibenzo-p-dioxins                     | Teniposide  | Valproate (Valproic acid)   |
| Polychlorinated dibenzofurans  | Terbacil  | Vanadium pentoxide (orthorhombic crystalline form)                          |
| Polygeenan   | Teriparatide  | Vinblastine sulfate   |
| Ponceau MX   | Terrazole   | Vinclozolin   |
| Ponceau 3R   | Testosterone and its esters   | Vincristine sulfate   |
| Potassium bromate  | Testosterone cypionate  | Vinyl bromide   |
| Potassium dimethyldithiocarbamate  | Testosterone enanthate  | Vinyl chloride  |
| Pravastatin sodium   | Tetrabromobisphenol A   | 4-Vinylcyclohexene  |
| Prednisolone sodium phosphate  | 3,3',4,4'-Tetrachloroazobenzene   | 4-Vinyl-1-cyclohexene diepoxide (Vinyl cyclohexenedioxide)                  |
| Primidone  | 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)  | Vinyl fluoride  |
| Procarbazine   | 1,1,2,2-Tetrachloroethane   | Vinylidene chloride   |
| Procarbazine hydrochloride   | Tetrachloroethylene (Perchloroethylene)   | (1,1-Dichloroethylene)  |
| Procymidone  | p-a,a,a-Tetrachlorotoluene-p-a,a,a-   | Vinyl trichloride (1,1,2-Trichloroethane)                                   |
| Progesterone   | Tetrachlorotoluene-p-a,a,a-Tetrachlorotoluene-p-a,a,a-Tetrachlorotoluene                            | Vismodegib  |
| Pronamide  | Tetrachlorvinphos   | Warfarin  |
| Propachlor   | Tetracycline (internal use)   | Wood dust   |
| 1,3-Propane sultone  | Tetracyclines (internal use)  | 2,6-Xylidine (2,6-Dimethylaniline)  |
| Propargite   | Tetracycline hydrochloride (internal use)   | Zalcitabine   |
| Propargite   | Tetrafluoroethylene   | Zidovudine (AZT)  |
|  | Tetranitromethane   | Zileuton  |
|  | Thalidomide   |   |

July 26, 2019

**CERTIFICATE OF MERIT (MedChemExpress LLC)**  
**(Health and Safety Code Section 25249.7(d))**

I, Benjamin D. Weston, hereby declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the parties identified in the notices have violated California 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 exposures to the listed chemicals that are 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.

Dated: July 26, 2019



Benjamin D. Weston

## Certificate of Service

I, Chris Johnson, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 498 Calle Principal, Monterey, California 93940.

2. On July 26, 2019, I served the following documents:
- 60-Day Notice of Violation (with Attachments A, B and C)
  - Certificate of Merit

on the following party by the method described below:

Chief Executive Officer  
MedChemExpressExpress LLC  
1 Deer Park Dr, Suite Q  
Monmouth Junction, New Jersey 08852

3. On July 26, 2019, I served the following documents:
- 60-Day Notice of Violation (with Attachments B and C)
  - Certificate of Merit

on each of the parties on the service list attached hereto by the method described below.

**BY MAIL:** I deposited such envelope in the mail at Monterey, California, with postage thereon fully prepaid. I am readily familiar with my company's practice of preparing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after date of my signature below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 26, 2019

\_\_\_\_\_  
Chris Johnson

\*\*\*\*\*

I, Benjamin D. Weston, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 1968 South Coast Highway, Suite 1200, Laguna Beach, CA 92651.



2. On July 26, 2019, I served the following documents:

- 60-Day Notice of Violation
- Certificate of Merit

on the following persons by causing a true and correct .PDF copy thereof to be sent via electronic mail to the parties listed below, pursuant to Cal. Code Regs., title. 27, § 25903(c)(1):

|  |   |
|--|---|
| Alameda County District Attorney<br><a href="mailto:CEPDProp65@acgov.org">CEPDProp65@acgov.org</a>                         | Calaveras County District Attorney<br><a href="mailto:Prop65Env@co.calaveras.ca.us">Prop65Env@co.calaveras.ca.us</a>                  |
| Contra Costa County District Attorney<br><a href="mailto:sgrassini@contracostada.org">sgrassini@contracostada.org</a>      | Inyo County District Attorney<br><a href="mailto:inyoda@inyocounty.us">inyoda@inyocounty.us</a>                                       |
| Lassen County District Attorney<br><a href="mailto:mlatimer@co.lassen.ca.us">mlatimer@co.lassen.ca.us</a>                  | Monterey County District Attorney<br><a href="mailto:Prop65DA@co.monterey.ca.us">Prop65DA@co.monterey.ca.us</a>                       |
| Napa County District Attorney<br><a href="mailto:CEPD@countyofnapa.org">CEPD@countyofnapa.org</a>                          | Riverside County District Attorney<br><a href="mailto:Prop65@rivcoda.org">Prop65@rivcoda.org</a>                                      |
| Sacramento County District Attorney<br><a href="mailto:Prop65@sacda.org">Prop65@sacda.org</a>                              | San Diego City Attorney<br><a href="mailto:CityAttyProp65@sandiego.gov">CityAttyProp65@sandiego.gov</a>                               |
| San Diego County District Attorney<br><a href="mailto:CityAttyCrimProp65@sandiego.gov">CityAttyCrimProp65@sandiego.gov</a> | San Francisco County District Attorney<br><a href="mailto:gregory.alker@sfgov.org">gregory.alker@sfgov.org</a>                        |
| San Francisco City Attorney<br><a href="mailto:Valerie.Lopez@sfcityattys.org">Valerie.Lopez@sfcityattys.org</a>            | San Joaquin County District Attorney DA<br><a href="mailto:DAConsumer.Environmental@sjcda.org">DAConsumer.Environmental@sjcda.org</a> |
| San Luis Obispo County District Attorney<br><a href="mailto:edobroth@co.slo.ca.us">edobroth@co.slo.ca.us</a>               | Santa Barbara County District Attorney<br><a href="mailto:DAProp65@co.santa-barbara.ca.us">DAProp65@co.santa-barbara.ca.us</a>        |
| Santa Clara County District Attorney<br><a href="mailto:EPU@da.sccgov.org">EPU@da.sccgov.org</a>                           | Santa Cruz County District Attorney<br><a href="mailto:Prop65DA@santacruzcounty.us">Prop65DA@santacruzcounty.us</a>                   |
| Sonoma County District Attorney<br><a href="mailto:jbarnes@sonoma-county.org">jbarnes@sonoma-county.org</a>                | Tulare County District Attorney<br><a href="mailto:Prop65@co.tulare.ca.us">Prop65@co.tulare.ca.us</a>                                 |
| Ventura County District Attorney<br><a href="mailto:daspecialops@ventura.org">daspecialops@ventura.org</a>                 | Yolo County District Attorney<br><a href="mailto:cfepd@yolocounty.org">cfepd@yolocounty.org</a>                                       |

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 26, 2019

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Benjamin D. Weston

## **List for Service by Mail**

Alpine County District Attorney  
P.O. Box 248  
Markleeville, CA 96120

Amador County District Attorney  
708 Court Street #202  
Jackson, CA 95642

Butte County District Attorney  
25 County Center Drive, Suite 245  
Oroville, CA 95965

Colusa County District Attorney  
346 Fifth Street, Suite 101  
Colusa, CA 95932

Del Norte County District Attorney  
450 H Street, Room 171  
Crescent City, CA 95531

El Dorado County District Attorney  
515 Main Street  
Placerville, CA 95667

Fresno County District Attorney  
2220 Tulare Street, Suite 1000  
Fresno, CA 93721

Glenn County District Attorney  
P.O. Box 430  
Willows, CA 95988

Humboldt County District Attorney  
825 5th Street, 4th Floor  
Eureka, CA 95501

Imperial County District Attorney  
940 West Main Street, Suite 102  
El Centro, CA 92243

Kern County District Attorney  
1215 Truxtun Avenue, 4th Floor  
Bakersfield, CA 93301

Kings County District Attorney  
1400 West Lacey Boulevard  
Hanford, CA 93230

Lake County District Attorney  
255 North Forbes Street  
Lakeport, CA 95453

Los Angeles County District Attorney  
211 West Temple Street  
Suite 1200  
Los Angeles, CA 90012

Madera County District Attorney  
209 West Yosemite Avenue  
Madera, CA 93637

Marin County District Attorney  
3501 Civic Center Drive, Room 130  
San Rafael, CA 94903

Mariposa County District Attorney  
5101 Jones Street, P.O. Box 730  
Mariposa, CA 95338

Mendocino County District Attorney  
100 North State Street, P.O. Box 1000  
Ukiah, CA 95482

Merced County District Attorney  
550 W. Main Street  
Merced, CA 95340

Modoc County District Attorney  
204 S. Court Street, Suite 202  
Alturas, CA 96101

Mono County District Attorney  
278 Main St  
Bridgeport, CA 93517

Nevada County District Attorney  
201 Commercial Street  
Nevada City, CA 95959

Orange County District Attorney  
401 Civic Center Drive  
West Santa Ana, CA 92701

Placer County District Attorney  
10810 Justice Center Drive, Suite 240  
Roseville, CA 95678

Plumas County District Attorney  
520 Main Street, Room 404  
Quincy, CA 95971

San Benito County District Attorney  
419 4th Street, Second Floor  
Hollister, CA 95203

San Bernardino County District Attorney  
303 West 3rd Street, 6th Floor  
San Bernardino, CA 92415-0502

San Mateo County District Attorney  
400 County Center, Third Floor  
Redwood City, CA 94063

Shasta County District Attorney  
1355 West Street  
Redding, CA 96001

Sierra County District Attorney  
100 Courthouse Square  
Downieville, CA 95936

Siskiyou County District Attorney  
P.O. Box 986  
Yreka, CA 96097

Solano County District Attorney  
675 Texas Street, Suite 4500  
Fairfield, CA 94533

Stanislaus County District Attorney  
832 12th Street, Suite 300  
Modesto, CA 95354

Sutter County District Attorney  
466 Second Street, Suite 102  
Yuba City, CA 95991

Tehama County District Attorney  
444 Oak Street, Room L  
Red Bluff, CA 96080

Trinity County District Attorney  
P.O. Box 310  
Weaverville, CA 96093

Tuolumne County District Attorney  
423 North Washington Street  
Sonora, CA 95370

Yuba County District Attorney  
215 Fifth Street  
Marysville, CA 95901

Office of the City Attorney, Los Angeles  
City Hall East  
200 North Main Street  
Los Angeles, CA 90012

Office of the City Attorney, Sacramento  
915 I Street, 4th Floor  
Sacramento, CA 95814

Office of the City Attorney, San Jose  
200 East Santa Clara Street, 16th Floor  
San Jose, CA 95113