## SIXTY DAY NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Cal. Health & Safety Code § 25249.5, et seq.) ("Proposition 65")

DATE: 12/2/2020

- TO: Susan Posnick Cosmetics California Attorney General's Office; District Attorney's Office for 58 Counties; and City Attorneys for Los Angeles, Sacramento, San Diego, San Jose, and San Francisco
- FROM: Piyush Yadav
- RE: Titanium Dioxide (airborne, unbound particles or respirable size) in Certain Loose Powder Cosmetic Products

## I. INTRODUCTION

My name is Piyush Yadav. I am a citizen of the State of California acting in the interest of the general public. I seek to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve human health by reducing hazardous substances contained in such items.

I have identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at Cal. Health & Safety Code § 25249.6 *et seq.*, with respect to the products identified below in Exhibit A. These violations by have occurred and continue to occur because the alleged violator, Susan Posnick Cosmetics (Susan Posnick), failed to provide required clear and reasonable warnings with these products.

Please allow this letter to serve as notice of these violations to Susan Posnick and the appropriate public enforcement agencies. Pursuant to Cal. Health & Safety Code § 25249.7(d), I intend to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

## II. GENERAL PROPOSITION 65 INFORMATION

For general information concerning the provisions of Proposition 65, please feel free to contact the Office of Environmental Health Hazard Assessment's ("OEHHA") Proposition 65 Implementation Office at (916) 445-6900 or visit their website at http://oehha.ca.gov/proposition-65. I have enclosed with this letter a copy of a summary of Proposition 65 prepared by the Office of Environmental Health Hazard Assessment.

## III. LISTED CHEMICAL

The violations involve exposure to the chemical Titanium Dioxide (airborne, unbound particles of respirable size). Effective September 2, 2011, the State of California officially listed Titanium dioxide (airborne, unbound particles of respirable size) as a chemical known to cause cancer.

## IV. NATURE OF ALLEGED VIOLATION (PRODUCT EXPOSURE )

Susan Posnick knowingly and intentionally exposed and continues to knowingly and intentionally expose consumers within the State of California to Titanium Dioxide (airborne, unbound particles of respirable size). The warning prong of Proposition 65 states 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 giving clear and reasonable warning to such individual..." *Cal. Health & Safety Code § 25249.6.* 

The specific types of products that are causing consumer exposures in violation of Proposition 65, and that are covered by this Notice, are listed in Exhibit A below. All products within the type covered by this Notice shall be referred to hereinafter as the "Products." Ongoing violations have occurred every day since at least the dates stated in Exhibit A, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until these known toxic chemicals are either removed from or reduced to allowable levels in the products. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemicals. The method of warning should be a warning that appears on the product label. Susan Posnick violated Proposition 65 because it failed to provide persons using these Products with appropriate warnings that they are being exposed to these chemicals, including by failing to have a warning on product labels for Products sold in California and failing to have a warning on the webpages where the Products are sold to purchasers in California.

Through the act of buying, acquiring and using any and all of the Products, California citizens are exposed to Titanium Dioxide (airborne, unbound particles of respirable size) when used in a standard manner, including as indicated on the product labels. The route of exposure to this chemical has been and continues to be inhalation. Inhalation of the listed chemical occurs when the Products are applied to the skin and face as directed, which releases respirable-sized particles of titanium dioxide into the air. No clear and reasonable warning is provided with the Products regarding the carcinogenic hazards of airborne titanium dioxide.

## V. CONTACT INFORMATION

Please direct all questions concerning this notice to me through my counsel's office at the following address:

Elizabeth Kramer Erickson Kramer Osborne LLP 182 Howard St. San Francisco, CA 94105 Telephone: (415) 635-0631 Email: elizabeth@eko.law

## VI. RESOLUTION OF NOTICED CLAIMS

Based on the allegations set forth in this Notice, I intend to file a citizen enforcement lawsuit against Susan Posnick unless it agrees in a binding written instrument to: (1) reformulate the identified products so as to eliminate further exposure to the identified chemicals, or provide appropriate warnings on the labels of these products; (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. Such a resolution will prevent further unwarned exposures to the identified chemicals, as well as expensive and time-consuming litigation.

If Susan Posnick is interested in resolving this dispute without resorting to time-consuming and expensive litigation, please feel free to contact my counsel identified in Section V above. It should be noted that neither my counsel nor I can: (1) finalize any settlement until after the 60-day notice period has expired; or (2) speak for the Attorney General or any district or city attorney who received this Notice. Therefore, while reaching an agreement with me will resolve my claims, such agreement may not satisfy public enforcement officials.

## VII. VIOLATING PRODUCTS (EXHIBIT A)

Brush on Block - Mineral Sunscreen Powder Broad Spectrum SPF 30 - Translucent (15%

micronized titanium dioxide)

(sold since approximately 10/1/11)

**Brush on Block - Mineral Sunscreen Refill Broad Spectrum SPF 30 - Translucent** (15% micronized titanium dioxide)

(sold since approximately 5/3/14)

Brush on Block - Tinted Mineral Sunscreen Powder Broad Spectrum SPF 30 - Touch of Tan (15% micronized titanium dioxide) (sold since approximately 10/1/2016)

Brush on Block - Tinted Mineral Sunscreen Refill - Touch of Tan (15% micronized titanium

dioxide)

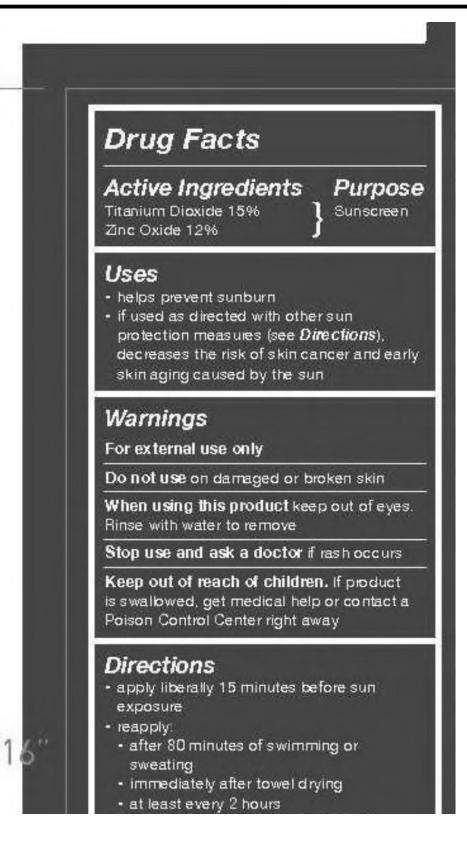
(sold since approximately 5/24/2018)

Brush On Block Duo Sunscreens - Translucent/Touch of Tan (15% micronized titanium dioxide) (sold since approximately 8/10/2014)

Further, it is this citizen's position that Susan Posnick is obligated to continue to conduct in good faith an investigation into other specific products within the type or category described above that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipient's custody or control) during the relevant period so as to ensure that the requisite toxic warnings were and are provided to California citizens prior to purchase.

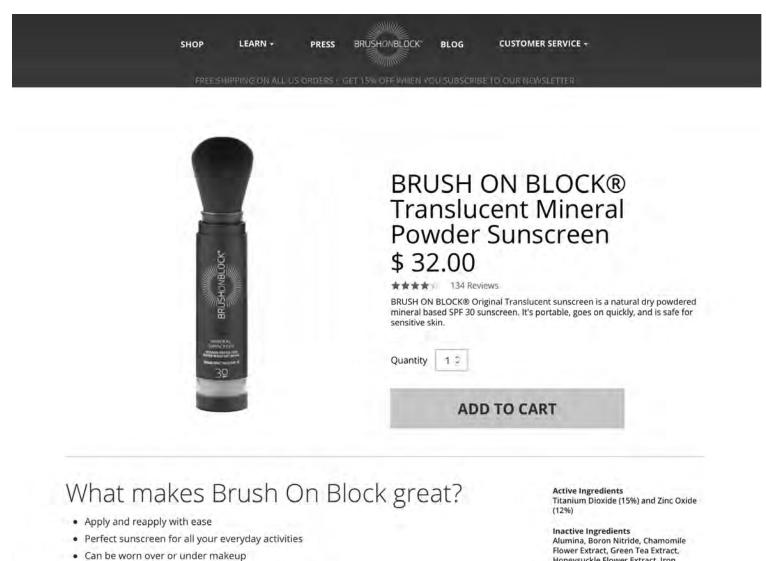
## Brush on Block - Mineral Sunscreen Powder Broad Spectrum SPF 30 - Translucent







## Brush on Block - Mineral Sunscreen Powder Broad Spectrum SPF 30 - Translucent



- Safe sunscreen for children and sensitive skin
- · Goes on translucent won't affect your normal skin tone
- · Great for scalp, part lines and thinning hair
- · No greasy texture, messy hands or white residue
- · Won't run in or sting your eyes
- Sweat and water resistant for up to 80 minutes
- · Will not soak into clothes, upholstery or sports equipment
- · Small, portable self dispensing brush put it in your bag and go
- Paraben, PABA and phthalate free
- · Cruelty free sunscreen not tested on animals

Inactive Ingredients Alumina, Boron Nitride, Chamomile Flower Extract, Green Tea Extract, Honeysuckle Flower Extract, Iron Oxides, Mica, Rice Lipids, Rice Starch, Safflower Oil, Silica, Stearic Acid, TriethoxycapryIsilane

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Brush on Block - Mineral Sunscreen Refill Broad Spectrum SPF 30 - Translucent





## Active Ingredients \_ Purpose Titanium Dioxide 15%

Zinc Oxide 12%

# Uses

- helps prevent sunburn
- if used as directed with other sun protection measures (see Directions), decreases the risk of skin cancer and early skin aging caused by the sun

Sunscreen

# Warnings

For external use only

Do not use on damaged or broken skin

When using this product keep out of eyes. Rinse with water to remove

Stop use and ask a doctor if rash occurs

Keep out of reach of children. If product vallowed, get medical help or contact a on Control Center right away

# Drug Facts (continued)

# Directions

- apply liberally 15 minutes before sun exposure
  - reapply:
    - after 80 minutes of swimming or sweating
    - · immediately after towel drying
    - at least every 2 hours
  - children under 6 months: Ask a doctor

## **Inactive Ingredients**

alumina, boron nitride, chamomile flower extract, green tea extract, honeysuckle (lonicera caprifolium and lonicera japonica) flower extract, iron oxides, jojoba oil, mica, rice lipids, rice starch, safflower oil, silica, stearic acid, triethoxycaprylylsilane

Questions or Comments? Call toll free 1-800-916-7690

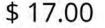


## Brush on Block - Mineral Sunscreen Refill Broad Spectrum SPF 30 - Translucent





# BRUSH ON BLOCK® Translucent Sunscreen Refill



★★★★★ 76 Reviews

The Brush On Block Translucent Sunscreen refill is a cartridge for the original dispenser. Contains the same dry powdered mineral based natural sunscreen as Brush On Block Translucent. Safe for sensitive skin and "eco" friendly.

Quantity 1 0

ADD TO CART

# What makes Brush On Block great?

- · Apply and reapply with ease
- · Perfect for all your everyday activities
- · Can be worn over or under makeup
- · Safe for children and sensitive skin
- · Goes on translucent won't affect your normal skin tone
- · Great for scalp, part lines and thinning hair
- · No greasy texture, messy hands or white residue
- · Won't run in or sting your eyes
- · Sweat and water resistant for up to 80 minutes
- Will not soak into clothes, upholstery or sports equipment
- · Small, portable self dispensing brush put it in your bag and go
- Paraben, PABA and phthalate free
- Cruelty free not tested on animals

Active Ingredients Titanium Dioxide (15%) and Zinc Oxide (12%)

#### **Inactive Ingredients**

Alumina, Boron Nitride, Chamomile Flower Extract, Green Tea Extract, Honeysuckle Flower Extract, Iron Oxides, Mica, Rice Lipids, Rice Starch, Safflower Oil, Silica, Stearic Acid, Triethoxycaprylsilane

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10

# Drug Facts FOR USA ONLY Active Ingredients Purpose Uses protection measures (see Directions), Warnings







## BRUSH ON BLOCK® Touch of Tan Mineral Powder Sunscreen \$ 32.00

★★★★☆ 20 Reviews

Same great sunscreen formula, now offered with a hint of warm color. Buildable color lets you apply radiant, warm color, and layer on for more depth.

Quantity 1 0

ADD TO CART

# What makes Brush On Block great?

- · Apply and reapply with ease
- · Perfect sunscreen for all your everyday activities
- · Can be worn over or under makeup
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- · Goes on translucent won't affect your normal skin tone
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## Directions

 apply liberally 15 minutes before sun exposure

reapply

- after 80 minutes of swimming or sweating
- immediately after towel drying
- at least every 2 hours
- children under 6 months: Ask a doctor

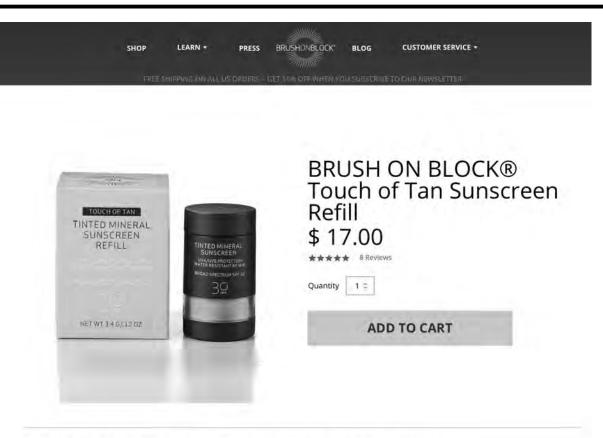
# Inactive Ingredients

alumina, boron nitride, chamomile flower extract, green tea extract, honeysuckle (Ionicera caprifolium and Ionicera japonica) flower extract, iron oxides, jojoba oil, mica, rice lipids, rice starch, safflower oil, silica, stearic acid, triethoxycaprylylsilane

## **Questions or Comments** Call toll free 1-800-916-7690



## Brush on Block - Tinted Mineral Sunscreen Refill - Touch of Tan



The Brush On Block Touch of Tan Sunscreen refill is a cartridge for the original dispenser. Contains the same dry powdered mineral-based natural sunscreen as Brush On Block Touch of Tan, with a beautiful hint of warmth. Safe for sensitive skin and "eco" friendly.

## What makes Brush On Block great?

- · Apply and reapply with ease
- Perfect for all your everyday activities
- · Can be worn over or under makeup
- · Safe for children and sensitive skin
- · Goes on translucent won't affect your normal skin tone
- Great for scalp, part lines and thinning hair
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- Won't run in or sting your eyes
- Sweat and water resistant for up to 80 minutes
- Will not soak into clothes, upholstery or sports equipment
- · Small, portable self dispensing brush put it in your bag and go
- Paraben, PABA and phthalate free
- · Cruelty free not tested on animals

#### Active Ingredients

Titanium Dioxide (15%) and Zinc Oxide (12%)

#### Inactive Ingredients

Alumina, Boron Nitride, Chamomile Flower Extract, Green Tea Extract, Honeysuckle Flower Extract, Iron Oxides, Mica, Rice Lipids, Rice Starch, Safflower Oil, Silica, Stearic Acid, Triethoxycaprylsilane





# Drug Facts FOR USA ONLY

Active Ingredients Purpose Titanium Dioxide 15% Sunscreen

# Uses

- helps prevent sunburn
- if used as directed with other sun protection measures (see *Directions*), decreases the risk of skin cancer and early skin aging caused by the sun

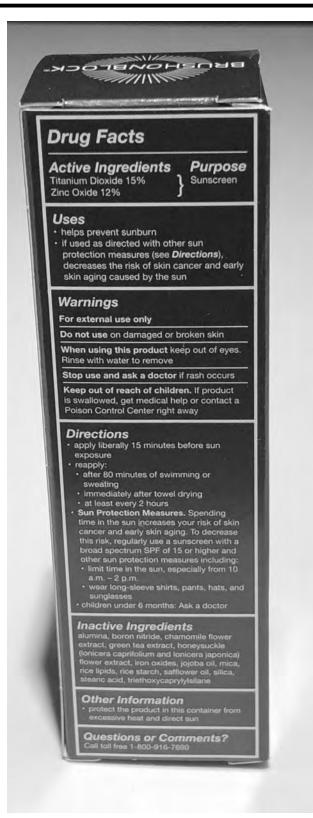
# Warnings

For external use only

Do not use on damaged or broken skin

When using this product keep out of eyes. Rinse with water to remove

Stop use and ask a doctor if rash occurs



## Brush On Block Duo Sunscreens - Translucent/Touch of Tan





## BRUSH ON BLOCK® - Duo Sunscreens \$ 54.00

☆☆☆☆☆ Write a review

Purchase two Brush On Block sunscreens at a 15% discount. These natural dry powdered mineral based SPF 30 sunscreens are portable, go on quickly, and are safe for sensitive skin.

Size

One Translucent, One Tinted Brush 💠

Quantity 1 🖸

ADD TO CART

# What makes Brush On Block great?

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## **CERTIFICATE OF MERIT**

California Health and Safety Code Section 25249.7(d)

I, Elizabeth Kramer, hereby declare:

1. This Certificate of Merit accompanies the attached 12/2/2020, sixty-day Notice of Violation ("Notice") in which it is alleged that the parties identified in the Notice have violated California Health and Safety Code § 25249.6, by failing to provide clear and reasonable warnings.

2. I am the attorney for the noticing party, Piyush Yadav.

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 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 information identified in Health and 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: 12/2/2020

<u>/s/ Elizabeth Kramer</u> Elizabeth Kramer Attorney for Piyush Yadav

## PROOF 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 over the age of 18 years, and not a party to the within action. My business address is 182 Howard St. San Francisco, CA. I am a resident or employed in the county where the mailing occurred.

On 12/2/2020, I served the following documents:

## SIXTY DAY NOTICE OF VIOLATION CAL. HEALTH & SAFETY CODE § 25249.5 *ET SEQ*.; PROPOSITION 65: A SUMMARY; CERTIFICATE OF MERIT

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties listed below and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery as indicated below:

Companies listed in Attached Company Service List (Priority Mail); City and District Attorneys listed in Attached Service List (First Class Mail).

Also on 12/2/2020, I transmitted via electronic mail the above-listed documents to the electronic mail addresses of the City and/or District Attorneys who have specifically authorized e-mail service and the authorization appears on the Attorney General's website. (See Attached Electronic Service List.)

Also on 12/2/2020, I served the California Attorney General (via website Portal) by uploading a true and correct copy thereof as a PDF file via the California Attorney General's website. Also on 12/2/2020, I also served the California Attorney General a true and correct copy of the CERTIFICATE OF MERIT ATTACHMENTS.

Dated: 12/2/2020

Respectfully Submitted,

<u>/s/ Elizabeth Kramer</u> Elizabeth Kramer Attorney for Piyush Yadav

## **Appendix A**

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

The following summary has been prepared by the office of Environmental Health Hazard Assessment, the lead and Toxic Enforcement Act 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 law. The reader is directed to the statue and its implementing regulations (See citations below) for further information.

Proposition 65 appears in California law as Health and Safety Code Sections 25249.5 through 25249.13. 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 Regulations, Sections 250000 through 27000.

# WHAT DOES PROPOSITION 65 REQUIRE?

*The "Governor's List"* Proposition 65 requires the Governor to publish a list of chemicals that are known to the State of California to cause cancer, or birth defects or other reproductive harm. This list must be updated at least once a year. Over 725 chemicals have been listed as of November 16, 2001. Only those chemicals that are on the list are regulated under this law. Businesses that produce, use, release, or otherwise engage in activities involving those 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. 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 is will effectively reach the person before he or she is exposed. Exposures are exempt from the warning requirement if they occur less than twelve months after the date of the listing of the chemical.

## 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. Discharges are exempt from this requirement if they occur less than twenty months after the date of the listing of chemical.

## **DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?**

Yes. The law exempts:

*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.

## Exposures that pose no significant risk of

*cancer.* For chemicals that are listed as known to the State to cause cancer ("carcinogens"), a warning is not required if the business 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 for more than 250 listed carcinogens.

*Exposures that will produce no observable reproductive effect at 1,000 times the level in question.* For chemicals known to the

State to cause birth defects or other reproductive harm ("reproductive toxicants"), a warning is not required if the business 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 (NOEL)," divided by a 1,000- fold safety or uncertainty factor. The "no observable effect level" is the highest dose level which has not been associated with an observable adverse reproductive or developmental effect.

## Discharge that do not result in a "significant amount" of the listed chemical entering into 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 list chemical has not, does not, or will not enter any drinking water source, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A "significant amount" means any detectable amount; expect an amount that would meet the "no significant risk" or "no observable effect" test if an individual were exposed to such an amount in drinking water.

# HOW IS PROPOSITION 65 ENFORCED?

Enforcement is carried out through civil lawsuits. These lawsuits may be brought be the Attorney General, any district attorney, or certain city attorneys (those in cities with a population exceeding 750,000). Lawsuit 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. A notice must comply with the information and procedural requirements specified in regulations (Title 27. California Code of Regulations, Section 25903). A private party may not pursue an enforcement action directly under Proposition 65 if one of the governmental officials noted above initiates an action within sixty days of 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 of law to stop committing the violation.

#### FOR FURTHER INFORMATION....

Contact the Office of Environmental Health Hazard Assessment=s Proposition 65 Implementation Office at (916)445-6900

# SERVICE LIST

The Honorable Nancy O'Malley	The Honorable Stacey Montgomery	The Honorable Candice Hooper	The Honorable Gregg Cohen
Alameda County District Attorney	Lassen County District Attorney	San Benito County District Attorney	Tehama County District Attorney
1225 Fallon Street, Room 900	220 South Lassen Street, Ste. B	419 4th Street, Second Floor	444 Oak Street, Room L
Oakland, CA 94612	Susanville, CA 96130	Hollister, CA 95203	Red Bluff, CA 96080
The Honorable Terese Drabec	The Honorable Jackie Lacey	The Honorable Michael Ramos	The Honorable Eric Heryford
Alpine County District Attorney	Los Angeles County District Attorney	San Bernardino County District Attorney	Trinity County District Altorney
270 Laramie Street, PO BOX 248	211 West Temple Street, Suite 1200	303 West 3rd Street, 6th Floor	P.O. Box 310
Markleeville, CA 96120	Los Angeles, CA 90012	San Bernardino, CA 92415-0502	Weaverville, CA 96093
The Honorable Todd Riebe	The Honorable David Linn	The Honorable Bonnie Dumanis	The Honorable Tim Ward
Amador County District Attorney	Madera County District Attorney	San Diego County District Attorney	Tulare County District Attorney
708 Court Street	209 West Yosemite Avenue	330 W. Broadway Street	221 South Mooney Boulevard, Rm 224
Jackson, CA 95642	Madera, CA 93637	San Diego, CA 92101	Visalia, CA 93291-4593
The Honorable Michael Ramsey	The Honorable Edward Berberian	The Honorable George Gascon	The Honorable Laura Krieg
Butte County District Attorney	Marin County District Attorney	San Francisco County District Attorney	Tuolumne County District Attorney
25 County Canter Drive	3501 Civic Center Drive, Room 130	850 Bryant Street, Room 322	423 North Washington Street
Orovilla, CA 95965	San Rafael, CA 34303	San Francisco, CA 34103	Sonora, CA 95370
The Honorable Barbara Yook	The Honorable Thomas Cooke	The Honorable Tori Verber Salazar	The Honorable Gregory Totten
Calaveras County District Attorney	Mariposa County District Altorney	San Joaquin County District Altorney	Ventura County District Attorney
991 Mountain Ranch Road	5101 Jones Street, P.O. Box 730	222 East Weber Avenue, Room 202	800 South Victona Avenue
San Andreas, CA 95249	Mariposa, CA 95338	Stockton, CA 35201	Ventura, CA 93009
The Honorable John Poyner	The Honorable C. David Eyster	The Honorable Dan Dow	The Honorable Jeff Reisig
Colusa County District Altorney	Mendocino County District Attornay	San Luis Obispo County District Atty	Yolo County District Attorney
346 Filth Street	100 North State Street, P.O. Box 1000	1035 Palm Street, 4th Floor	301 Second Street
Colusa, CA 95932	Ukiah, CA 95482	San Luis Obispo, CA 33408	Woodland, CA 95895
The Honorable Mark Peterson	The Honorable Larry Morse II	The Honorable Stephen Wagstalfe	The Honorable Patrick McGrath
Contra Costa County District Attorney	Marced County District Attorney	San Mateo County District Attorney	Yuba County District Attorney
900 Ward Street	550 W. Main Streat	400 County Center, Third Floor	215 Fifth Street
Martinez, CA 94553	Marced, CA 95340	Redwood City, CA 94063	Marysville, CA 95901
The Honorable Dale Trigg Del Norte County District Attorney 450 H Street, Room 171 Crescent City, CA 95531	The Honorable Jordan Funk Modoc County District Attorney 204 S. Court Street, Suite 202 Alturas, CA 96101	The Honorable Joyce Dudley Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA 93101	The Honorable Mike Feuer Office of the City Attorney, Los Angeles 800 City Hall East 200 North Main Street Los Angeles, CA 90012
The Honorable Vern Pierson	The Honorable Tim Kendall	The Honorable Jeffrey Rosen	The Honorable James Sanchez
El Dorado County District Attorney	Mono County District Attorney	Santa Clara County District Attorney	Office of the City Attorney, Sacramento
778 Pacific Street	P.O. Box 617	70 West Hedding Street, West Wing	915 I Street, 4th Floor
Placerville, CA 95667	Bridgeport, CA 93517	San Jose, CA 95110	Sacramento, CA 95814
The Honorable Lisa Smittcamp	The Honorable Dean Flippo	The Honorable Jeff Rosell	The Honorable Jan Goldsmith
Fresno County District Altorney	Monterey County District Attorney	Santa Cruz County District Attorney	Office of the City Attorney, San Diego
2220 Tulare Street, #1000	P.O. Box 1131	701 Ocean Street, Room 200	1200 Third Avenue, Suite 1620
Fresno, CA 93721	Salinas, CA 93902	Santa Cruz, CA 95060	San Diego, CA 92101
The Honorable Dwayne Stewart Glenn County District Attorney P.O. Box 430 Willows, CA 95988	The Honorable Allison Haley Napa County District Attornay 1127 First Street, Suite C Napa, CA 94559	The Honorable Stephen Carlton Shasta County District Attorney 1355 West Street Redding, CA 96001	The Honorable Dennis Herrera Office of the City Attorney, San Francisco 1 Dr. Carlton B. Goodlett Place San Francisco, CA 94102
The Honorable Maggie Fleming	The Honorable Clifford Newell	The Honorable Lawrance Allen	The Honorable Richard Doyle
Humboldi County District Attorney	Nevada County District Attorney	Sierra County Districl Attorney	Office of the City Altorney, San Jose
825 5th Street, Fourth Floor	201 Commercial Street	100 Courthouse Square	200 East Santa Clara Street, 18th Floor
Eureka, CA 95501	Nevada City, CA 95959	Downieville, CA 95936	San Jose, CA 95113
The Honorable Gilbert Otero Imperial County District Attorney 940 West Main Street, Suite 102 El Centro, CA 92243	The Honorable Tony Rackauckas Orange County District Attorney 401 Civic Center Drive West Santa Ana, CA 92701	The Honorable James Kirk Andrus Siskiyou County District Attorney P.O. Box 986 Yreka, CA 96097	Office of the California Attorney General Proposition 65 Enforcement Reporting ATTN: Prop 65 Coordinator 1515 Clay Street, Suite 2000 Oakland, CA 94612-0550
The Honorable Thomas Hardy	The Honorable R. Scott Owens	The Honorable Krishna Abrams	
Inyo County District Attorney	Placer County District Attorney	Solano County District Attorney	
P.O. Drawer D	10810 Justice Center Drive, Suite 240	675 Texas Street, Suite 4500	
Independence, CA 93526	Roseville, CA 95678	Fairfield, CA 94533	
The Honorable Lisa Green	The Honorable David Hollister	The Honorable Jill Ravitch	
Kern County District Attorney	Plumas County District Attorney	Sonoma County District Attorney	
1215 Truxtun Avenue	520 Main Street, Room 404	600 Administration Drive, Room 212J	
Bakersfield, CA 93301	Quincy, CA 95971	Santa Rosa, CA 95403	
The Honorable Keilh Fagundas	The Honorable Michael Hestrin	The Honorable Birgit Fladager	
Kings County District Attorney	Riverside County District Attorney	Stanislaus County District Attorney	
1400 West Lacey Boulevard	3960 Orange Street	832 12th Street, Suite 300	
Hanford, CA 93230	Riverside, CA 92501	Modesto, CA 95354	
The Honorable Donald Anderson	The Honorable Anne Marie Schubert	The Honorable Amanda Hopper	
Lake County District Attorney	Sacramento County District Attorney	Sutter County District Attorney	
255 North Forbes Street	901 G Street	463 Second Street, Suite 102	
Lakeport CA 95453	Sacramento CA 95814	Yuba City CA 35991	