



January 14, 2021

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

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that Cydea, Inc. has been, is, will be and threatens to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when California residents ingest beverages that are served to them using either of the following two products: Kegco Polished Brass Beer Faucet with Brass Lever, #493K-CFBL PVD and Beverage Factory Polished Brass Beer Faucet with Stainless Steel Lever, # KC-493S-CFSL PVD. The valves in these beer faucets are made of leaded brass. When beer or other beverages (such as kombucha) flow through these faucets, the beverage dissolves some of the lead and thus becomes contaminated by lead. People drink these lead-contaminated beverages and are exposed to lead, a chemical known to cause cancer and reproductive toxicity. Cydea, Inc. did not and does not provide people with clear and reasonable warnings before its beer faucets exposes them to lead. These violations have occurred every day since at least January 14, 2020 and will continue every day until the lead is removed from the valves in these beer faucets, or until clear and reasonable warnings are given.

Cordially,

William Verick

SERVICE LIST

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

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

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

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

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

OFFICE OF THE CITY ATTORNEY
CITY OF SAN DIEGO CONSUMER &
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SAN DIEGO, CA 92101

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25 COUNTY CENTER DR.
OROVILLE, CA 95965

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GOVERNMENT CENTER
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SAN ANDREAS, CA 95249

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COLUSA, CA 95932

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450 H ST #171
CRESCENT CITY, CA 95531

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COUNTY OF EL DORADO
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PLACERVILLE, CA 95667

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COUNTY OF GLENN
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COUNTY OF HUMBOLDT
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EUREKA, CA 95501

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EL CENTRO, CA 92243-2880

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P.O. DRAWER D
INDEPENDENCE, CA 93526

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PO BOX 1000
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SALINAS, CA 93902

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931 PARKWAY MALL
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COUNTY GOVERNMENT CENTER #450
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VENTURA COUNTY DISTRICT ATTORNEY'S
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800 SOUTH VICTORIA AVE
VENTURA, CA 93009

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YOLO
301 SECOND STREET
WOODLAND, CA 95695

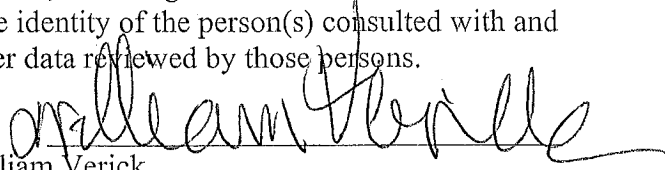
OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YUBA
215 5TH ST.
MARYSVILLE, CA 95901

CRAIG COSTANZO, PRESIDENT
CYDEA, INC.
8510 MIRALANI DRIVE
SAN DIEGO, CA 92126-4351

CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: January 14, 2021


William Verick

CERTIFICATE OF SERVICE

I, Matt Lang, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 1125 Sixteenth Street, Suite 204, Arcata, California, 95521. On January 14, 2021, I caused the attached NOTICE OF VIOLATION LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached NOTICE OF VIOLATION and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 14, 2021, at Arcata, California.


Matt Lang