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February 18, 2021

The Ambassador Towers
691 South Irolo Street
Los Angeles, CA 90005

Beverly Hills Properties, LLC
9441 Wilshire Blvd., Penthouse
Los Angeles, CA 90212

Donald T. Sterling Corporation
9441 Wilshire Blvd, Penthouse
Beverly Hills, CA 90212

The Sterling Family Trust
c/o Rochelle Sterling as sole trustee
1900 Avenue of the Stars, Suite 2100
Los Angeles, CA 90067

ConAm Management, Corporation
3990 Ruffin Road, Suite 100
San Diego, California 92123

Office of the California Attorney General
Attention: Prop 65 Coordinator
1515 Clay Street, Suite 2000
Post Office Box 70550
Oakland, California 94612-0550

Los Angeles District Attorney's Office
211 West Temple Street, Suite 1200
Los Angeles, CA 90012

Los Angeles City Attorney's Office
James K. Hahn City Hall East, Suite 800
Los Angeles, CA 90012

Re: Notice of Violations of California Health & Safety Code § 25249.5 et seq.

PURPOSE OF NOTICE

This firm represents one (1) current tenant of an apartment complex located at 691 South Irolo Street, in the City and County of Los Angeles (the "Premises"), owned and/or managed by Beverly Hills Properties, LLC., The Sterling Family Trust, ConAm Management, Corporation, and Donald T. Sterling Corporation (collectively, the "Owners/Management"), in connection with this notice of violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code§ 25249.5 et seq.

Proposition 65 requires that notice of the alleged violations and of the intent to sue be given to the violators at least 60 days before a lawsuit is filed. This letter is sent pursuant to the provisions of Health & Safety Code § 25249.7, and satisfies the statutory notice prerequisite for filing an action in the Superior Court against any of the violators. If the governmental authorities, on which this notice is served, do not take action with respect to the alleged violation within 60 calendar days of the sending of this notice, and an additional five days if the place of mailing and the place of receipt are both in California, Plaintiff Angie Brown may file suit.

CHEMICAL: Asbestos

DATE OF LISTING: On February 27, 1987, Asbestos was added to the list of chemicals known to cause cancer and/or reproductive toxicity, which is more than 30 years before Claimant's service of this notice.

ROUTE OF EXPOSURE: Inhalation

GENERAL INFORMATION

For general information, please see "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary" prepared by the California EPA and attached to this notice as Appendix A. (Appendix not included in notice served on public enforcement agencies.)

VIOLATORS COVERED UNDER THIS NOTICE

The Owners/Management, and each of their respective affiliates (collectively, the "Noticees") are the violators covered under this notice. The Noticees are currently or have been involved in demolition, construction, and renovation work that have taken place within the Claimant's individual units and the common areas on the Premises.

Well over the last five (5) years, Noticees have failed to notify their tenants, visitors, and employees of the asbestos on the Premises, in violation of the requirements of Proposition 65, despite knowledge that asbestos was present in the pool room, equipment rooms, parking area, garages, walkways, apartments, air ducts, and common areas of 691 South Irolo Street, Los Angeles, CA 90005 (the "Premises") contained within the fireproofing materials, among others, throughout the building. The deterioration of walls, ceilings, pipes, and other structural components of the Premises has resulted in Claimant and other individuals being exposed to airborne asbestos particles in apartments and common areas. Further, Noticees have undertaken extensive demolition, construction, and renovation work at the Premises. Their activities have included, but are not limited to, the replacement of all pipes for hot and cold water supply, replacement of waste lines, replacement of all heating, ventilating, corridor updates, and air conditioning (HV/AC) systems. As a result of the demolition, construction, and renovation activities at the Premises, asbestos was released within apartments, the parking garage, and common areas. Claimant and other exposed individuals have not received required clear and reasonable warning regarding their risk of exposure to asbestos.

The Claimant and other exposed individuals were entitled to warnings that they were exposed to asbestos fibers within apartments and common areas of the Premises. Claimant and other exposed individuals were not warned of the threat of exposure to asbestos fibers released within apartments and common areas of the Premises from April 2014 to the present. The activities of the Noticees did not meet the requirements for asbestos remediation and abatement under California law and South Coast Air Quality Management District ("SCAQMD") regulations. Their activities have in fact exacerbated the problem at the Premises and continue to expose Claimant and others to airborne asbestos particles.

Noticees had knowledge of the California asbestos laws and knew they had an obligation to notify tenants of the asbestos risks and to regularly monitor, inspect, manage the asbestos known to exist at the Premises. As a result of the failure to abide by the California asbestos laws, the Noticees permitted the Claimant and other individuals to be exposed to asbestos fibers within apartments and common areas of the Premises since April 2014 without proper warning.

The manner in which the Noticees permitted Claimant and others to be exposed to asbestos fibers is through inhalation of airborne and settled friable asbestos particles that were present in high concentrations within the Premises' apartments and common areas on or after April of 2014.

DURATION OF VIOLATIONS

Since 2002, Noticees have knowingly concealed and failed to disclose the presence of asbestos on the Premises. These violations continued every day until the present date. To this day, tenants, employees, and visitors of the Premises continue to be exposed to airborne asbestos particles without clear and reasonable warnings per the requirements outlined under Proposition 65.

While notices were provided at some point in 2020 regarding the potential asbestos exposure, such were grossly insufficient in content pursuant to the requirements of Proposition 65. Additionally, such notices were untimely, as all parties named herein were aware of the existence of asbestos for years without providing proper notification to staff, guests, and residence.

PLEASE DIRECT ANY INQUIRIES TO:

Marc G. Reich, Esq.
Reich Radcliffe & Hoover LLP
4675 MacArthur Ct., Suite 550
Newport Beach, CA 92660
T 949.975.0512

Alison S. Gokal, Esq.
Gokal Law Group, Inc.
26080 Towne Centre Drive
Foothill Ranch, CA 92610
T 949.753.9100
F 866.610.9381

David Alami, Esq.
Alami Law Group
620 Newport Center Dr., Suite 1100
Newport Beach, CA 92660
T 949.287.3594

In keeping with the public interest goals of the statute and the objective of protecting the tenants and the community at-large from further toxic exposures, we are interested in seeking a constructive resolution of this matter to avoid continuing unwarned exposure to asbestos without protracted litigation. Upon expiration of sixty (60) days following service of this notice, Claimants will file a complaint with claims under Proposition 65 against the defendants if state or local officials do not undertake enforcement action by that time.

Sincerely,

Alison S. Gokal

cc: Marc G. Reich;
David Alami

Enclosures

CERTIFICATE OF MERIT

I, Alison S. Gokal, hereby declare:

1) This Certificate of Merit accompanies the attached sixty (60) day notice in which it is alleged the parties identified in the notice have violated Health & Safety Code section 25249.6 by failing to provide clear and reasonable warnings.

2) I am the attorney for the noticing party.

3) I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposure to the listed 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 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.

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: 2/18/21

Signed: _____
Alison S. Gokal, Esq.

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.[1] These implementing regulations are available online at: http://oehha.ca.gov/prop65/law/P65Regs.html.

WHAT DOES PROPOSITION 65 REQUIRE?

The "Proposition 65 List." Under Proposition 65, the lead agency (OEHHA) publishes a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. Chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as damage to

[1] 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.

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[2] 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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[2] 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.

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.

Date: 2/18/80
Name of Noticing Party's Attny: Gokal Law Group, Inc., 26080 Towne Ctre Dr., Foothill Ranch, CA 92610
Phone Number: 949.7753.9100

SPECIAL COMPLIANCE PROCEDURE

PROOF OF COMPLIANCE

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

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

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

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

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

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

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

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

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

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

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

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

Date: 2/18/80
Name of Noticing Party's Attny: Gokal Law Group, Inc., 26080 Towne Ctre Dr., Foothill Ranch, CA 92610
Phone Number: 949.7753.9100

IMPORTANT NOTES:

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

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

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

Certification of Compliance

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

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

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

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

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

Certification

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

_____ _____

Signature of authorized representative Date

Date: 2/18/80
Name of Noticing Party's Attny: Gokal Law Group, Inc., 26080 Towne Ctre Dr., Foothill Ranch, CA 92610
Phone Number: 949.7753.9100
Name and title of signatory

FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at

P65Public.Comments@oehha.ca.gov.

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.

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 26080 Towne Centre Drive, Foothill Ranch, CA 92610.

On February 18 2021, I served the foregoing document(s) described as: **PROP 65 NOTICE** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED MAILING LIST

[ ] BY ELECTRONIC SERVICE VIA ONELEGAL EFILING SERVICE: I served the above-entitled document(s) through the OneLegal E-Filing Service at www.onelegal.com addressed to all parties appearing on the electronic list for the above-entitled case. A copy of the One Legal Service Receipt Page/Confirmation will be maintained with the original document(s) in this office.

[ ] BY ELECTRONIC SERVICE: I served the above-entitled document(s) via e-mail.

[x] BY MAIL: After signing this proof of service, I will mail a true and correct copy of the above-described documents in a sealed envelope. I am "readily familiar" with the firm's practice of collection and processing 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 at Foothill Ranch, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on February 18, 2021, at Foothill Ranch, California.

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

Holly Thomas

HOLLY THOMAS

SERVICE LIST

The Ambassador Towers
691 South Irolo Street
Los Angeles, CA 90005

Beverly Hills Properties, LLC
9441 Wilshire Blvd., Penthouse
Los Angeles, CA 90212

Donald T. Sterling Corporation
9441 Wilshire Blvd., Penthouse
Beverly Hills, CA 90212

The Sterling Family Trust
c/o Rochelle Sterling as sole trustee
1900 Avenue of the Stars, Suite 2100
Los Angeles, CA 90067

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3990 Ruffin Road, Suite 100
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Attention: Prop 65 Coordinator
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211 West Temple Street, Suite 1200
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James K. Hahn City Hall East, Suite 800
Los Angeles, CA 90012