# **60-D**AY NOTICE OF VIOLATION

SENT IN COMPLIANCE WITH Cal. Health & Safety Code § 25249.5, et seq. ("Proposition 65")

DATE:	August 6, 2021
ТО:	<ul> <li>Kylie Jenner, Inc.</li> <li>COTY Inc.</li> <li>HFC Prestige Products, Inc.</li> <li>California Attorney General's Office</li> <li>District Attorney's Office for All California Counties; and</li> <li>City Attorneys for San Francisco, San Diego, San Jose, Sacramento and Los Angeles</li> </ul>
FROM:	Public Health and Safety Advocates, LLC

### I. INTRODUCTION

**Public Health and Safety Advocates, LLC** ("PHSA") is the noticing entity, acting in the interest of the general public. It seeks to reduce or eliminate the presence of hazardous substances in consumer products sold in California, and to ensure that California consumers are aware of the presence of such substances in consumer goods so that they can make an educated effort to limit their own exposure where deemed necessary.

This Notice is provided to the public agencies listed above pursuant to California Health & Safety Code § 25249.6, *et seq.*) ("Proposition 65"). As noted above, notice is also being provided to the violator: KYLIE JENNER, INC; COTY INC; HFC PRESTIGE PRODUCTS, INC (the "Violators"). The violations covered by this Notice consists of a summary of Proposition 65, Statement of Violation, Number and Duration of Violation, Product Category/Type, Listed Chemical(s), Preservation of Evidence, Product Exposure, Routes of Exposure and type of harm resulting from exposure to the chemicals ("Listed Chemicals") as follows:

Product Exposure:	See Section VI. and VII. Exhibit A
Listed Chemical:	Acetaldehyde
Routes of Exposure:	Dermal Absorption, Ingestion and Inhalation
Type of Harm:	Cancer, Birth Defect and other Reproductive Harm

### II. PROPOSITION 65 INFORMATION – SUMMARY

A summary of Proposition 65 and its implementation regulations, prepared by the Office of Environmental Health Hazard Assessment, the lead agency designated under Proposition 65, is enclosed with the copy of the Notice served on the Notice Recipients. For more 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.

### **III.** STATEMENT OF VIOLATIONS

The specific type of product that is causing consumer exposures in violation of Proposition 65, and that is covered by this Notice, is listed under "Product Category/Type" in section VI. and the specific toxicant(s)/Listed Chemical(s) is set forth in Exhibit A of Section VII. All products within the category covered by this Notice shall be referred to hereinafter as the "Covered Product(s)" or "Product(s)". Exposures to the Listed Chemical from the use of the Products have been occurring without the "clear and reasonable warning" required by Proposition 65. The method of the warning should be a label on the product itself. Without proper warnings regarding the toxic effects of exposures to the Listed Chemical resulting from contact with the Products, California citizens lack the information

necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Products.

The Notice Recipients knowingly and intentionally exposed, and continue to knowingly and intentionally expose, consumers within the State of California to the Listed Chemical(s), a chemical known to the State of California to cause cancer, birth defects and other reproductive harm, without first giving clear and reasonable warning of this exposure to such individuals. In particular, the Notice Recipients failed to provide a clear and reasonable warning to consumers that the Listed Product expose consumers to Listed Chemical(s).

# IV. NUMBER AND DURATION OF VIOLATIONS

Each and every sale of a Covered Product to a consumer in California without a clear and reasonable warning is a violation, including transactions made over-the-counter, through the internet, and/or via catalogue by the Notice Recipients and any other sellers of the Covered Products. These violations have been occurring since at least August 6, 2018, as well as every day since the Covered Products were first introduced and sold in the State of California. These violations will continue until "clear and reasonable warning" are provided prior to exposure of the Listed Chemicals.

### V. ROUTE OF EXPOSURE

California consumers and other individuals, through the use of the Listed Product, are exposed to the Listed Chemical. The routes of for the violations are: (1) dermal absorption directly through the skin when consumer applies the Hand Sanitizer; and (2) ingestion via hand-to-mouth contact after consumers apply the Hand Sanitizer to their hand; (3) inhalation for breathing in the ambient airborne particle of Acetaldehyde.

By way of example but not limitation, exposures occur when California Citizens use as an ingredient, eat, sample or otherwise ingest the product. These acts cause consumers and other individuals to be exposed to the Listed Chemical through the routine consumption of all or a portion of the product containing the Listed Chemical. People likely to be exposed include both children and adult including women of childbearing age.

# VI. PRODUCT CATEGORY/TYPE

Identified below is a specific example of Covered Products recently purchased and witnessed as being available for purchase or use in California (the "Exemplar Product"). Based on publicly available information, the retailers, distributors, and/or manufacturers of the Exemplar Product is also provided.

The Exemplar Product is identified for the Notice Recipients' benefit to assist in their investigation of the allegations set forth in this Notice. The Exemplar Product is not meant to be an exhaustive or comprehensive identification of each specific offending product falling within the specific type or category of Covered Products at issue in this Notice. The Example Product is a representative of class of product called "Hand Sanitizers". It is the PHSA's position that the Notice Recipients are obligated to conduct a good-faith investigation into other specific products falling within the type or category of Covered Products that have been manufactured, imported, distributed, sold, shipped, stored, or are otherwise within the Notice Recipients' custody or control, so as to ensure the requisite toxic warnings were and are provided to California citizens prior to purchase.

Exemplar Product	Chain of Commerce		
Exemplar Froduct	Wholesaler/Distributor	Manufacturer; Importer; Distributor	
KylieSkin Hand Sanitizer	COTY INC.; KYLIE JENNER, INC.	COTY INC.; KYLIE JENNER, INC.	
UPC:850005353836	HFC PRESTIGE PRODUCTS, INC	HFC PRESTIGE PRODUCTS, INC	

### VII. EXHIBIT A – LISTED CHEMICAL

**Product Category / Type** 

Hand Sanitizer

# Toxicant(s)

Acetaldehyde

### VIII. RESOLUTION OF NOTICED CLAIMS

Consistent with goals of Proposition 65 and a desire to have these violations corrected, PHSA is interested in seeking a resolution of this matter that includes a binding written agreement by the Violators to: (1) recall any products already sold, or undertake best efforts to ensure that the requisite health hazard warnings are provide to those who have received such products; (2) reformulate the Covered Product so as to eliminate further exposures to the Covered Chemical(s), or provide appropriate warnings on the labels of these products; and (3) pay an appropriate civil penalty. Such a resolution will prevent further unwarned consumer exposure to the Covered chemical(s), as well as expensive and time-consuming litigation. It should be noted that counsel cannot (1) finalize any settlement until after the 60-day notice period has expired; or (2) speak for the California Attorney General or any District or City Attorney who has received this notice. Therefore, while reaching an agreement with PHSA will resolve its claims; such an agreement may not satisfy the public prosecutors.

Proposition 65 requires that notice of intent to sue be given to the violators(s) sixty (60) days before the suit is filed. *Cal. Health & Safety Code § 25249.7(d)(1)*. With this letter, PHSA gives notice of the alleged violations to Violator and the appropriate governmental authorities. In absence of any action by the appropriate governmental authorities within sixty (60) calendar days of the sending of this notice PHSA may file suit. *See Cal. Code Civ. Proc.* § 1013; *Cal. Health & Safety Code § 25249.7(d)(1)*; and *Cal. Code Regs.* Tit. 27 § 25903(d)(1). Per *Cal. Code Regs.* Tit. 27, § 25600.2(g) (2018) the retail seller noticed on this 60 Day Notice is hereby requested to promptly provide the names and contact information for the manufacture(s), producer(s), packager(s), importer(s), supplier(s), and/or distributor(s) of the Listed Products in this Notice.

Public Health and Safety Advocates, LLC remains open and willing to discuss the possibilities of resolving its grievance short of formal litigation.

### IX. PRESERVATION OF EVIDENCE

This Notice also serves as a demand that the Notice Recipients preserve and maintain all relevant evidence, including all electronic document and data, pending resolution of this matter. Such relevant evidence incudes but is not limited to all documents relating to the presence of the Listed Chemicals in the Covered Product; purchase and sales information for Covered Products (i.e., list of purchasers and quantity sold; list of manufacture(s), producer(s), packager(s), importer(s), supplier(s), and/or distributor(s) and quantity in each transaction, as well as current inventory of the Covered Product in stock); efforts to comply with Proposition 65 with respect to the Covered Products; communications with any person relating to the presence or potential presence of the Listed Chemical in Covered Products; and representative exemplars of each specific model falling within the Covered Products. This demand applies to all relevant evidence for Covered Products sold in the State of California, as far back as August 6, 2018 through the date of any trial of the claims alleged in this Notice.

# X. CERTIFICATE OF MERIT

Pursuant to Health & Safety Code §25249.6 and Title 11, California Code of Regulations, section 3100, a Certificate of Merit is attached hereto. A second copy of the entire notice and Certificate of Merit is served on the Attorney General with all supporting documentation required by section 3102 attached hereto.

# XI. CONTACT INFORMATION

Public Health and Safety Advocates, LLC has retained the Law Offices of Danialpour & Associates as legal counsel in this matter. Please direct all communications related to this Notice of Violation to the following:

Davar Danialpour, Esq. Danialpour & Associates 357 S. Robertson Blvd. 2<sup>ND</sup> Floor Beverly Hills, CA 90211 Telephone: (310) 444-0055 Facsimile: (310) 444-0066 Email: david@davarlaw.com

Sincerely,

Davar Daniałpour, Esq. Danialpour & Associates Attorneys for Public Health and Safety Advocates, LLC

Dated: August 6, 2021

Attachments:

Certificate of Merit; Certificate of Service; The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary; Confidential Information in Support of Certificate of Merit (Attorney General Only)

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# **CERTIFICATE OF MERIT**

Health and Safety Code Section 25249.7(d)

I, Davar Danialpour, hereby declare:

- 1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the parties identified in the notice have violated Health and Safety Code § 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 exposure to the Listed Chemical that is the subject of this 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 Violators 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: August 6, 2021

Davar Danialpour

### 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.

Proposition 65 appears in California law as Health and Safety Code Sections 25249.5 through 25249.13. The statute 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 "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 and/or reproductive toxicity. This means that 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 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.

<sup>&</sup>lt;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.

**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 full and part-time 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: <a href="http://www.oehha.ca.gov/prop65/getNSRLs.html">http://www.oehha.ca.gov/prop65/getNSRLs.html</a> 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.

# 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 <u>civil penalties of up to \$2,500 per day for each</u> <u>violation</u>. In addition, the business may be ordered by a court to stop committing the violation.

# 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.

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

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

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am over the age of 18 and not a party to this case. I am a resident or employed in the county where the mailing occurred. My business address is 357 S. Robertson Blvd. 2<sup>nd</sup> Floor Beverly Hills, CA 90211.

# ON THE DATE SHOWN BELOW, I SERVE THE FOLLOWING DOCUMENTS:

- 1) 60-Day Notice of Violation of Health & Safety Code § 25249.5, ET SEQ.
- 2) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary
- 3) Certificate of Merit pursuant to Health & Safety Code § 25249.7(d)

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 by Certified Mail:

Pierre Laubies, Or Current CEO	KYLIE JENNER, CEO	Thomas trautmann, or Current CEO
COTY INC.	KYLIE JENNER, INC.	HFC PRESTIGE PRODUCTS, INC.
350 5TH AVE	9255 W SUNSET BLVD FL 2	350 FIFTH AVENUE 19TH FLOOR
NEW YORK, NY, 10118-0110	WEST HOLLYWOOD, CA, 90069-3308	NEW YORK NY 10118
ERESIDENTAGENT, INC	Corporation Service Company	Corporation Service Company
(C2702827)	(C1592199)	(C1592199)
c/o KYLIE JENNER, INC.	c/o HFC Prestige Products, Inc.	c/o COTY, Inc.
7801 Folsom Blvd, STE 202	2710 Gateway Oak Drive, STE 150N	2710 Gateway Oak Drive, STE 150N
Sacramento, CA 95826	Sacramento, CA 95833	Sacramento, CA 95833

Additionally,

ON THE DATE SHOWN BELOW. I SERVE THE FOLLOWING DOCUMENTS:

- 1) 60-Day Notice of Violation of Health & Safety Code § 25249.5, ET SEQ.
- 2) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary
- 3) Certificate of Merit pursuant to Health & Safety Code § 25249.7(d)
- 4) Supporting Factual Information Sufficient to establish the bases for Certificate of Merits

on the following party when a true and correct copy thereof was uploaded on the California Attorney General's website, which can be accessed at: https://oag.ca.gov/prop65/add-60-day-notice:

> Office of the California Attorney General Prop 65 Enforcement Reporting 1515 Clay Street, Suite 2000 Oakland, CA 94612-0550

# Additionally,

ON THE DATE SHOWN BELOW, I SERVE THE FOLLOWING DOCUMENTS:

- 1) 60-Day Notice of Violation of Health & Safety Code § 25249.5, ET SEQ.
- 2) Certificate of Merit pursuant to Health & Safety Code § 25249.7(d)

on each of the parties on the "Distribution List" attached, and depositing it at a U.S. Postal Service office with postage fully prepaid for delivery by First Class Mail, and on each of the parties listed on the "Electronic Service" when a true and correct copy thereof was sent via electronic mail:

Executed on August 6, 2021 , in Beverly Hills, California.

Faraz Adjnasian

# **Distribution** List

Distribution List			
Alpine County District Attorney	Lake County District Attorney	San Jose City Attorney's Office	
PO Box 248	255 N. Forbes Street	200 East Santa Clara Street, 16th Floor	
Markleeville, CA 96120	Lakeport, CA 95453	San Jose, CA 95113	
Amador County District Attorney	Los Angeles County District Attorney	San Mateo County District Attorney	
708 Court Street, Suite 202	211 West Temple Street, Suite 1200	400 County Ctr., 3 <sup>rd</sup> Floor	
Jackson, CA 95642	Los Angeles, CA 90012	Redwood City, CA 94063	
Butte County District Attorney	Los Angeles City Attorney's Office	Shasta County District Attorney	
25 County Center Drive	200 N. Main Street Suite 800	1355 West Street	
Oroville, CA 95965	Los Angeles, CA 90012	Redding, CA 96001	
Colusa County District Attorney	Madera County District Attorney	Sierra County District Attorney	
346 Fifth Street Suite 101	209 West Yosemite Avenue	100 Courthouse Square, 2 <sup>nd</sup> Floor	
Colusa, CA 95932	Madera, CA 93637	Downieville, CA 95936	
Del Norte County District Attorney	Marin County District Attorney	Siskiyou County District Attorney	
450 H Street, Suite 171	3501 Civic Center Drive, Suite 130	PO Box 986	
Crescent City, CA 95531	San Rafael, CA 94903	Yreka, CA 96097	
El Dorado County District Attorney	Mendocino County District Attorney	Solano County District Attorney	
778 Pacific St.	PO Box 1000	675 Texas Street Suite 4500	
Placerville, CA 95667	Ukiah, CA 95482	Fairfield, CA 94533	
Fresno County District Attorney	Modoc County District Attorney	Stanislaus County District Attorney	
2220 Tulare Street, Suite 1000	204 S. Court Street, Suite 202	832 12 <sup>th</sup> Street, Suite 300	
Fresno, CA 93721	Alturas, CA 96101	Modesto, CA 95354	
Glenn County District Attorney	San Bernardino County District Attorney	Sutter County District Attorney	
PO Box 430	303 West Third Street	463 Second Street	
Willows, CA 95988	San Bernardino, CA 92415	Yuba City, CA 95991	
Humboldt County District Attorney	Mono County District Attorney	Tehama County District Attorney	
825 5 <sup>th</sup> Street 4 <sup>th</sup> Floor	PO Box 2053	PO Box 519	
Eureka, CA 95501	Mammoth Lakes, CA 93546	Red Bluff, CA 96080	
Imperial County District Attorney 940 West Main Street Suite 102	Orange County District Attorney 300 N. Flower St.	Trinity County District Attorney PO Box 310	
El Centro, CA 92243	Santa Ana, CA 92703 San Benito County District Attorney	Weaverville, CA 96093	
Kern County District Attorney 1215 Truxtun Avenue	419 Fourth Street, 2 <sup>nd</sup> Floor	Tuolumne County District Attorney 423 N. Washington Street	
Bakersfield, CA 93301	Hollister, CA 95023	Sonora, CA 95370	
Kings County District Attorney	San Bernardino County District Attorney	Yuba County District Attorney	
1400 West Lacey Boulevard	303 W. Third Street	215 Fifth Street, Suite 152	
Hanford, CA 93230	San Bernardino, CA 92415	Marysville, CA 95901	
Humord, 01175250	Electronic Service	Warysville, Crr 75761	
The Honorable Nancy O'Malley	The Honorable Clifford H. Newell	The Honorable Tori Verber Salazar	
Alameda County District Attorney	Napa County District Attorney	San Joaquin County District Attorney	
CEPDProp65@acgov.org	DA.Prop65@co.nevada.ca.us	DAConsumer.Environmental@sjcda.org	
The Honorable Barbara Yook	The Honorable Morgan Briggs Gire	The Honorable Eric J. Dobroth	
Calaveras County District Attorney	Placer County District Attorney	San Luis Obispo Deputy District Attorney	
Prop65Env@co.calaveras.ca.us	Prop65@placer.ca.gov	edobroth@co.slo.ca.us	
The Honorable Stacey Grassini	The Honorable David Hollister	The Honorable Christopher Dalbey	
Contra Costa Deputy District Attorney	Plumas County District Attorney	Santa Barbara Deputy District Attorney	
sgrassini@contracostada.org	davidhollister@countyofplumas.com	DAProp65@co.santa-barbara.ca.us	
The Honorable Thomas L. Hardy	The Honorable Paul E. Zellerbach	The Honorable Bud Porter	
Inyo County District Attorney	Riverside County District Attorney	Santa Clara Supervising Deputy District Attorney	
inyoda@inyocounty.us	Prop65@rivcoda.org	EPU@da.sccgov.org	
The Honorable Michelle Latimer	The Honorable Anne Marie Schubert	The Honorable Jeffrey S. Rosell	
Lassen County Program Coordinator	Sacramento County District Attorney	Santa Cruz County District Attorney	
mlatimer@co.lassen.ca.us	Prop65@sacda.org	Prop65DA@santacruzcounty.us	
The Honorable Walter W. Wall	The Honorable Summer Stephan	The Honorable Stephan R. Passalacque	
Mariposa County District Attorney	San Diego County District Attorney	Sonoma County District Attorney	
mcda@mariposacounty.org	SanDiegoDAProp65@sdcda.org	jbarnes@sonoma-county.org	
The Honorable Kimberly Lewis	The Honorable Mark Ankcorn	The Honorable Phillip J. Cline	
Merced County District Attorney	San Diego Deputy City Attorney	Tulare County District Attorney	
Prop65@countyofmerced.com	CityAttyProp65@sandiego.gov	Prop65@co.tulare.ca.us	
The Honorable Jeannine M. Pacioni	The Honorable Valerie Lopez	The Honorable Gregory D. Totten	
Monterey County District Attorney	San Francisco Deputy City Attorney	Ventura County District Attorney	
Prop65DA@co.monterey.ca.us	Valerie.Lopez@sfcityatty.org	daspecialops@ventura.org	
The Honorable Gary Lieberstein	The Honorable Alethea M. Sargent	The Honorable Jeff W. Reisig	
Napa County District Attorney	San Francisco Assistant District Attorney	Yolo County District Attorney	
CEPD@countyofnapa.org	alethea.sargent@sfgov.org	cfepd@yolocounty.org	