## 60-DAY NOTICE OF VIOLATION

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

**DATE:** October 27, 2021

TO: Walmart, Inc.; Wal-Mart Stores, Inc.; Walmart.com USA, LLC

California Attorney General's Office

District Attorney's Office for All California Counties; and

City Attorneys for San Francisco, San Diego, San Jose, Sacramento and Los Angeles

**FROM:** Public Health and Safety Advocacy, LLC

#### I. INTRODUCTION

**Public Health and Safety Advocacy, 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 violators WALMART, INC.; WAL-MART STORES, INC.; WALMART.COM USA, LLC (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: Lead & Cadmium

Routes of Exposure: Ingestion and Dermal Absorption

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 & Cadmium 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 October 27, 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 act of using and consuming the Covered Product, are exposed to the Listed Chemical. Consumers ingest the Listed Chemical by eating the Covered Product, or when they touch and handle the Covered Products, transfer the Listed Chemical from the Covered Products onto their fingers and hands, and transfer the Listed Chemical from their fingers and hands to their mouths through hand-to-mouth activities that may continue to occur for a significant period after contact with the Covered Products.

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. 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	
	Wholesaler(s); Retailer(s)	Manufacturer(s); Importer(s); Distributor(s)
Cooked Seafood Mix Calamari, Shrimp,		
Mussels, Octopus & Imitation Crab Meat	Walmart Inc.	Walmart Inc.
UPC: 078742329949		

VII. EXHIBIT A – LISTED CHEMICAL		
Product Category / Type	Toxicant(s)	
Seafood	Lead & Cadmium	

#### 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 Advocacy, 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 October 27, 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 Advocacy, 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,

Dated: October 27, 2021

Davar Danialpour Esq.

Danialpour & Associates

Attorneys for

Public Health and Safety Advocacy, LLC

#### 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)

## **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: October 27, 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 & Cadmium 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. 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.

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> violation. 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

7

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

### CERTIFICATE OF SERVICE PURSUANT TO 27 CCR 8 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 STE 400 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 <u>Certified Mail</u>:

WALMART, INC.; WAL-MART STORES, INC. WALMART.COM USA, LLC AGENT FOR SERVICE OF PROCESS CT CORPORATION SYSTEM 330 N. BRAND BLVD. STE 700 GLENDALE, CA 91203

#### 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 <u>uploaded</u> on the <u>California Attorney</u> 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 "<u>Distribution List</u>" 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 "<u>Electronic Service</u>" when a true and correct copy thereof was sent via electronic mail.

Executed on October 27, 2021 in Beverly Hills, California.

Faraz Adjnasian

**Distribution List** 

Alpine County District Attorney PO Box 248  Markleeville, CA 96120  Lakeport, CA 95453  San Jose City Attorney's Office 200 East Santa Clara Street, 16th Floor San Jose, CA 95113  San Bate County District Attorney  400 County District Attorney  Sheats County District Attorney  1355 West Street  Shasta County District Attorney  Sierra County District Attorn
Markleeville, CA 96120Lakeport, CA 95453San Jose, CA 95113Amador County District Attorney 708 Court Street, Suite 202Los Angeles County District Attorney 211 West Temple Street, Suite 1200San Mateo County District Attorney 400 County Ctr., 3rd Floor 400 County Ctr., 3rd FloorJackson, CA 95642Los Angeles, CA 90012Redwood City, CA 94063Butte County District AttorneyLos Angeles City Attorney's Office 25 County Center Drive Oroville, CA 95965Shasta County District AttorneyColusa County District Attorney 346 Fifth Street Suite 101 Colusa, CA 95932Madera County District Attorney Madera County District AttorneySierra County District Attorney 100 Courthouse Square, 2nd Floor Downieville, CA 95936Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531Marin County District Attorney 3501 Civic Center Drive, Suite 130 San Rafael, CA 94903Siskiyou County District Attorney Yreka, CA 96097El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667Mendocino County District Attorney Wendocino County District AttorneySolano County District Attorney Solano County District AttorneyFresno County District Attorney 2220 Tulare Street, Suite 1000 Fresno, CA 93721Modoc County District Attorney Alturas, CA 96101San Bernardino County District Attorney San Bernardino County District Attorney San Bernardino County District Attorney San Bernardino County District Attorney 463 Second StreetSutter County District Attorney 463 Second Street
Amador County District Attorney 708 Court Street, Suite 202  Jackson, CA 95642  Butte County District Attorney 25 County Center Drive Oroville, CA 95965  Del Norte County District Attorney 400 County District Attorney 400 County District Attorney 400 County District Attorney 36 Fifth Street, Suite 202  Madera, CA 93637  Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95667  El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667  Fresno County District Attorney 200 N. Main Street District Attorney 300 N. Main Street Suite 101 San Rafael, CA 94001  Madera County District Attorney 360 County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531  El Dorado County District Attorney Mendocino County District Attorney 778 Pacific St. Placerville, CA 95667  Fresno County District Attorney 200 N. Main County District Attorney 201 Modoc County District Attorney 2020 Tulare Street, Suite 1000 204 S. Court Street, Suite 202 Alturas, CA 96101  San Bernardino County District Attorney Sutter County District Attorney Sount Street Suite Attorney Sount Street, Suite 300 Sutter County District Attorney Sount Street, Suite 300 Sutter County District Attorney Sounter County District Attorney Sounty District Attorney Sounty District Attorney Solano County District Attorney 303 West Third Street 463 Second Street
708 Court Street, Suite 202  Jackson, CA 95642  Butte County District Attorney 25 County Center Drive 200 N. Main Street Suite 800  Colusa County District Attorney 346 Fifth Street Suite 101  Colusa, CA 95932  Del Norte County District Attorney 450 H Street, Suite 171  Crescent City, CA 95531  El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667  Fresno County District Attorney 204 S. Court Street, Suite 100  Del Norte Street, Suite 100  County District Attorney Addera, CA 94903  El Dorado County District Attorney Affective Canada Street Affective Canada Stree
Jackson, CA 95642   Los Angeles, ĈA 90012   Redwood Ĉity, CA 94063
Butte County District Attorney 25 County Center Drive Oroville, CA 95965  Colusa County District Attorney 346 Fifth Street Suite 101 Colusa, CA 95932  Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531  El Dorado County District Attorney TR Pacific St. Placerville, CA 95667  Fresno County District Attorney Modoc County District Attorney Modoc County District Attorney Modoc County District Attorney Modoc County District Attorney Solano County District Attorney About Scheet, Suite 170 Colusa, CA 93637  Downieville, CA 95936  Marin County District Attorney Siskiyou County District Attorney PO Box 986 Yreka, CA 96097  Solano County District Attorney PO Box 1000 Ukiah, CA 95482  Fresno County District Attorney PO Box 430  Fairfield, CA 94533  San Bernardino County District Attorney Sutter County District Attorney Ados Second Street
25 County Center Drive Oroville, CA 95965 Colusa County District Attorney 346 Fifth Street Suite 101 Colusa, CA 95932 Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531 El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667 Fresno County District Attorney 209 West Yosemite Avenue 450 H Street, Suite 170 County District Attorney 450 H Street, Suite 171 Solano County District Attorney 450 H Street, Suite 170 Solano County District Attorney 450 H Street, Suite 170 Solano County District Attorney 450 H Street, Suite 170 Solano County District Attorney 778 Pacific St. Placerville, CA 95667 Fresno County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 1000 Solano County District Attorney 450 H Street, Suite 202 45 Court Street, Suite 202 45 Court Street, Suite 202 45 Solano Street 463 Second Street 463 Second Street
Oroville, CA 95965  Los Angeles, CA 90012  Redding, CA 96001  Sierra County District Attorney  346 Fifth Street Suite 101  Colusa, CA 95932  Del Norte County District Attorney  450 H Street, Suite 171  Crescent City, CA 95531  El Dorado County District Attorney  778 Pacific St.  Placerville, CA 95667  Fresno County District Attorney  209 West Yosemite Avenue  Madera, CA 93637  Downieville, CA 95936  Marin County District Attorney  3501 Civic Center Drive, Suite 130  San Rafael, CA 94903  PO Box 986  Yreka, CA 96097  El Dorado County District Attorney  778 Pacific St.  Placerville, CA 95667  Fresno County District Attorney  209 West Yosemite Avenue  Madera County District Attorney  Madera County District Attorney  Madera County District Attorney  Siskiyou County District Attorney  PO Box 986  Yreka, CA 96097  Solano County District Attorney  Solano County District Attorney  675 Texas Street Suite 4500  Fairfield, CA 94533  Fresno County District Attorney  204 S. Court Street, Suite 202  Alturas, CA 96101  Modesto, CA 95354  Glenn County District Attorney  San Bernardino County District Attorney  Sutter County District Attorney  Sutter County District Attorney  Sutter County District Attorney  Sutter County District Attorney  463 Second Street
Colusa County District Attorney 346 Fifth Street Suite 101 Colusa, CA 95932  Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531  El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667  Fresno County District Attorney 209 West Yosemite Avenue Madera, CA 93637  Madera, CA 93637  Downieville, CA 95936  Marin County District Attorney 3501 Civic Center Drive, Suite 130 San Rafael, CA 94903  Fresno County District Attorney PO Box 1000 Placerville, CA 95667  Fresno County District Attorney Modoc County District Attorney 204 S. Court Street, Suite 202 Fresno, CA 93721  Glenn County District Attorney Siskiyou County District Attorney Siskiyou County District Attorney Siskiyou County District Attorney PO Box 986 Yreka, CA 96097  Mendocino County District Attorney Solano County District Attorney Fairfield, CA 94533  Fresno County District Attorney Stanislaus County District Attorney 832 12th Street, Suite 300 Modesto, CA 95354  Glenn County District Attorney San Bernardino County District Attorney Sutter County District Attorney Sutter County District Attorney Sutter County District Attorney 463 Second Street
346 Fifth Street Suite 101209 West Yosemite Avenue100 Courthouse Square, 2nd FloorColusa, CA 95932Madera, CA 93637Downieville, CA 95936Del Norte County District AttorneyMarin County District AttorneySiskiyou County District Attorney450 H Street, Suite 1713501 Civic Center Drive, Suite 130PO Box 986Crescent City, CA 95531San Rafael, CA 94903Yreka, CA 96097El Dorado County District AttorneyMendocino County District AttorneySolano County District Attorney778 Pacific St.PO Box 1000675 Texas Street Suite 4500Placerville, CA 95667Ukiah, CA 95482Fairfield, CA 94533Fresno County District AttorneyModoc County District AttorneyStanislaus County District Attorney2220 Tulare Street, Suite 1000204 S. Court Street, Suite 202832 12th Street, Suite 300Fresno, CA 93721Alturas, CA 96101Modesto, CA 95354Glenn County District AttorneySan Bernardino County District AttorneySutter County District AttorneyPO Box 430303 West Third Street463 Second Street
Colusa, CA 95932Madera, CA 93637Downieville, CA 95936Del Norte County District AttorneyMarin County District AttorneySiskiyou County District Attorney450 H Street, Suite 1713501 Civic Center Drive, Suite 130PO Box 986Crescent City, CA 95531San Rafael, CA 94903Yreka, CA 96097El Dorado County District AttorneyMendocino County District AttorneySolano County District Attorney778 Pacific St.PO Box 1000675 Texas Street Suite 4500Placerville, CA 95667Ukiah, CA 95482Fairfield, CA 94533Fresno County District AttorneyModoc County District AttorneyStanislaus County District Attorney2220 Tulare Street, Suite 1000204 S. Court Street, Suite 202832 12th Street, Suite 300Fresno, CA 93721Alturas, CA 96101Modesto, CA 95354Glenn County District AttorneySan Bernardino County District AttorneySutter County District AttorneyPO Box 430303 West Third Street463 Second Street
Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531 El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667 Fresno County District Attorney 2220 Tulare Street, Suite 1000 Fresno, CA 93721 Glenn County District Attorney Po Box 430 Marin County District Attorney 3501 Civic Center Drive, Suite 130 PO Box 986 Yreka, CA 96097 Solano County District Attorney Solano County District Attorney 675 Texas Street Suite 4500 Fairfield, CA 94533 Fresno County District Attorney Stanislaus County District Attorney 832 12th Street, Suite 300 Modesto, CA 95354 Glenn County District Attorney San Bernardino County District Attorney Sutter County District Attorney 90 Box 430 Siskiyou County District Attorney PO Box 986 Yreka, CA 96097 Solano County District Attorney Street Suite 4500 Modesto, CA 94533 Stanislaus County District Attorney Sutter County District Attorney Sutter County District Attorney 463 Second Street
Del Norte County District Attorney 450 H Street, Suite 171 Crescent City, CA 95531 El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667 Fresno County District Attorney 2220 Tulare Street, Suite 1000 Fresno, CA 93721 Glenn County District Attorney Po Box 430 Marin County District Attorney 3501 Civic Center Drive, Suite 130 PO Box 986 Yreka, CA 96097 Solano County District Attorney Solano County District Attorney 675 Texas Street Suite 4500 Fairfield, CA 94533 Fresno County District Attorney Stanislaus County District Attorney 832 12th Street, Suite 300 Modesto, CA 95354 Glenn County District Attorney San Bernardino County District Attorney Sutter County District Attorney 90 Box 430 Siskiyou County District Attorney PO Box 986 Yreka, CA 96097 Solano County District Attorney Street Suite 4500 Modesto, CA 94533 Stanislaus County District Attorney Sutter County District Attorney Sutter County District Attorney 463 Second Street
450 H Street, Suite 171 Crescent City, CA 95531 San Rafael, CA 94903 Fl Dorado County District Attorney 778 Pacific St. Placerville, CA 95667 Fresno County District Attorney 2220 Tulare Street, Suite 1000 Fresno, CA 93721 Glenn County District Attorney PO Box 430 San Rafael, CA 94903 Fresto, Suite 130 Fyreka, CA 96097 Solano County District Attorney Solano County District Attorney Fo Box 1000 Green District Attorney Solano County District Attorney Fo Box 1000 Fresno, CA 95667 Fairfield, CA 94533 Street, Suite 4500 Fairfield, CA 94533 Stanislaus County District Attorney Stanislaus County District Attorney Stanislaus County District Attorney San Bernardino County District Attorney Sutter County District Attorney Fo Box 430 Solano County District Attorney Solano County District Attorney Solano County District Attorney Stanislaus County District Attorney Stanislaus County District Attorney Sutter County District Attorney Sutter County District Attorney 463 Second Street
Crescent City, CA 95531  San Rafael, CA 94903  Yreka, CA 96097  El Dorado County District Attorney  778 Pacific St.  PO Box 1000  Placerville, CA 95667  Wish, CA 95482  Fresno County District Attorney  2220 Tulare Street, Suite 1000  Fresno, CA 93721  Glenn County District Attorney  PO Box 430  San Rafael, CA 94903  Yreka, CA 96097  Mendocino County District Attorney  Solano County District Attorney  675 Texas Street Suite 4500  Fairfield, CA 94533  Stantislaus County District Attorney  Stantislaus County District Attorney  832 12th Street, Suite 300  Modesto, CA 95354  Glenn County District Attorney  San Bernardino County District Attorney  Sutter County District Attorney  463 Second Street
El Dorado County District Attorney 778 Pacific St. Placerville, CA 95667 Placerville, CA 95667 Placerville, CA 95667 Wood County District Attorney 2220 Tulare Street, Suite 1000 Fresno, CA 93721 Glenn County District Attorney PO Box 430  Mendocino County District Attorney PO Box 1000 Solano County District Attorney Fairfield, CA 94533 Stanislaus County District Attorney Stanislaus County District Attorney 832 12th Street, Suite 300 Modesto, CA 95354 Modesto, CA 95354 San Bernardino County District Attorney Sutter County District Attorney 463 Second Street
Placerville, CA 95667 Ukiah, CA 95482 Fairfield, CA 94533 Fresno County District Attorney  2220 Tulare Street, Suite 1000 Fresno, CA 93721 Glenn County District Attorney  Alturas, CA 96101 San Bernardino County District Attorney  PO Box 430  Ukiah, CA 95482 Fairfield, CA 94533  Stanislaus County District Attorney  832 12 <sup>th</sup> Street, Suite 300 Modesto, CA 95354  San Bernardino County District Attorney Sutter County District Attorney 463 Second Street
Fresno County District Attorney  2220 Tulare Street, Suite 1000  Fresno, CA 93721  Glenn County District Attorney  PO Box 430  Modoc County District Attorney  Modoc County District Attorney  204 S. Court Street, Suite 202  832 12 <sup>th</sup> Street, Suite 300  Modesto, CA 95354  San Bernardino County District Attorney  Sutter County District Attorney  463 Second Street
2220 Tulare Street, Suite 1000204 S. Court Street, Suite 202832 12th Street, Suite 300Fresno, CA 93721Alturas, CA 96101Modesto, CA 95354Glenn County District AttorneySan Bernardino County District AttorneySutter County District AttorneyPO Box 430303 West Third Street463 Second Street
Fresno, CA 93721 Alturas, CA 96101 Modesto, CA 95354  Glenn County District Attorney PO Box 430 San Bernardino County District Attorney 303 West Third Street 463 Second Street
Fresno, CA 93721 Alturas, CA 96101 Modesto, CA 95354  Glenn County District Attorney PO Box 430 San Bernardino County District Attorney 303 West Third Street 463 Second Street
Glenn County District Attorney PO Box 430  San Bernardino County District Attorney 303 West Third Street  Sutter County District Attorney 463 Second Street
Willows CA 05088 San Bernardina CA 02415 Vula City CA 05001
Willows, CA 93766 Sail Dellarullo, CA 92413
Humboldt County District Attorney Mono County District Attorney Tehama County District Attorney
825 5th Street 4th Floor PO Box 2053 PO Box 519
Eureka, CA 95501 Mammoth Lakes, CA 93546 Red Bluff, CA 96080
Imperial County District Attorney Orange County District Attorney Trinity County District Attorney
940 West Main Street Suite 102 401 West Civic Center Drive PO Box 310
El Centro, CA 92243 Santa Ana, CA 92701 Weaverville, CA 96093
Kern County District Attorney San Benito County District Attorney Tuolumne County District Attorney
1215 Truxtun Avenue 419 Fourth Street, 2 <sup>nd</sup> Floor 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

**Electronic Service** 

	Electronic Service	
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 Allison Haley	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