

# 60-DAY NOTICE OF VIOLATION

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

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**DATE:** April 22, 2022

**TO: MANUFACTURER**  
**Aachi Masala Foods (P) Ltd**  
Plot No.1926 34th Street  
Ishwarya Colony I Block  
Anna Nagar West  
Chennai 600 040, India.

**DISTRIBUTOR**  
**Vadilal Industries USA Inc**  
280 Wilson Ave Ste 3 Newark, NJ, 07105

**RETAILER**  
**India Super Mart – LAKE FOREST**  
24601 Raymond Way, Suite 6, Lake Forest, CA 92630

**GOVERNMENT OFFICES**  
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:** Healthy California LLC

**THIS NOTICE AMENDS THE ORIGINAL NOTICE OF VIOLATION AG 2022-00698. Removes one product.**

## **I. INTRODUCTION**

**Healthy California 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: Aachi Masala Foods (P) Ltd, Vadilal Industries USA Inc, India Super Mart – LAKE FOREST (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:

<b>Product Exposure:</b>	See Section VI. and VII. Exhibit A
<b>Listed Chemical:</b>	Lead
<b>Routes of Exposure:</b>	Ingestion and Dermal Absorption
<b>Type of Harm:</b>	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 exposes 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 from the date of purchase of product provided below in Section VI, 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 “Violating Product”). Based on publicly available information, the retailers, distributors, and/or manufacturers of the Violating Product is also provided.

The Violating Products are identified for the Notice Recipients’ benefit to assist in their investigation of the allegations set forth in this Notice. The Violating 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.

Product Category: Food

<b><u>Violating Product</u></b>	<b><u>Date of Purchase</u></b>	<b><u>Retailer(s)</u></b>	<b><u>Distributor(s)</u></b>	<b><u>Manufacturer(s)</u></b>	<b><u>Toxicant(s)</u></b>
AACHI- BIRYANI MASALA	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead
AACHI- CHICKEN 65 MASALA	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead
AACHI- CHICKEN CURRY MASALA	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead
AACHI- FISH FRY MASALA	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead
AACHI- MADRAS SAMBAR POWDER	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead
AACHI- SAMBAR POWDER	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead
AACHI- VATHAKULAMBU MASALA	2/10/2022	India Super Mart – LAKE FOREST	Vadilal Industries USA Inc	Aachi Masala Foods (P) Ltd	Lead

## VII. EXHIBIT A – LISTED CHEMICAL

<b><u>Toxicant(s)</u></b>
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Lead

### **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 provided 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 violator(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 manufacturer(s), producer(s), packager(s), importer(s), supplier(s), and/or distributor(s) of the Listed Products in this Notice.

Healthy California 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 includes 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 manufacturer(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 February 20, 2018 through the date of any trial of the claims alleged in this Notice.

### **X. CERTIFICATE OF MERIT**

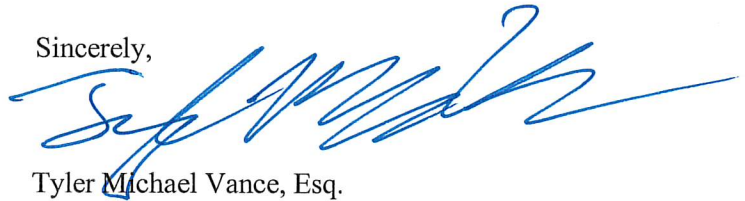
Pursuant to Health & Safety Code § 25249.6 and Title 11, California Code of Regulations, section 3100, a Certificate of Merit is attached hereto. A second copy of the entire notice and Certificate of Merit is served on the Attorney General with all supporting documentation required by section 3102 attached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

### **XI. CONTACT INFORMATION**

Healthy California LLC has retained Healthy California Law Group LLP, as legal counsel in this matter. Please direct all communications related to this Notice of Violation to the following:

Tyler Michael Vance, Esq.  
Healthy California Law Group LLP  
5396 La Bodega Way  
Fontana, CA 92336  
Telephone: (562) 644-4186  
Email: [HealthyCaliforniaLawGroupLLP@gmail.com](mailto:HealthyCaliforniaLawGroupLLP@gmail.com)

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tyler Michael Vance', is written over the printed name.

Tyler Michael Vance, Esq.

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)

## 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. <sup>1</sup> 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 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](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:

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<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>.



**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 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:

<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<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.

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

***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.



# CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

I, Tyler Michael Vance, 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 plaintiffs 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).

DATE: \_\_\_\_\_

4-22-22



Tyler Michael Vance

**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 5396 La Bodega Way, Fontana, CA 92336.

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:

Aachi Masala Foods (P) Ltd Plot No.1926 34th Street Ishwarya Colony I Block Anna Nagar West Chennai 600 040, India	Vadilal Industries USA Inc 280 Wilson Ave Ste 3 Newark, NJ, 07105	India Super Mart – LAKE FOREST 24601 Raymond Way, Suite 6, Lake Forest, CA 92630
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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) **Additional Supporting Factual Information Sufficient to establish the bases for the Certificate of Merit as required by Health & Safety Code § 25249.7(d)(1)**

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 the following parties when a true and correct copy thereof was sent via electronic mail to each of the parties listed below:

Stacey Grassini, Deputy District Attorney Contra Costa County  
900 Ward Street  
Martinez, CA 94553  
[sgrassini@contracostada.org](mailto:sgrassini@contracostada.org)

Dije Ndreu, Deputy District Attorney Monterey County  
1200 Aguajito Road  
Monterey, CA 93940  
[Prop65DA@co.monterey.ca.us](mailto:Prop65DA@co.monterey.ca.us)

Allison Haley, District Attorney Napa County  
931 Parkway Mall  
Napa, CA 94559  
[CEPD@countyofnapa.org](mailto:CEPD@countyofnapa.org)

Paul E. Zellerbach, District Attorney Riverside County  
3072 Orange Street  
Riverside, CA 92501  
[Prop65@rivcoda.org](mailto:Prop65@rivcoda.org)

Anne Marie Schubert, District Attorney Sacramento County  
901 G Street  
Sacramento, CA 95814  
[Prop65@sacda.org](mailto:Prop65@sacda.org)

Gregory Alker, Assistant District Attorney San Francisco County  
732 Brannan Street  
San Francisco, CA 94103  
[Gregory.alker@sfgov.org](mailto:Gregory.alker@sfgov.org)

Jeff W. Reisig, District Attorney Yolo County  
301 Second Street  
Woodland, CA 95695  
[District.Attorney@yolocounty.org](mailto:District.Attorney@yolocounty.org)

Tori Verber Salazar, San Joaquin County District Attorney  
222 E. Weber Ave, Suite 202  
Stockton, CA 95202  
[DAConsumer.Environmental@sjcda.org](mailto:DAConsumer.Environmental@sjcda.org)

District Attorney, Alameda County  
1225 Fallon Street, Suite 900  
Oakland, CA 94612-4208  
[CEPDProp65@acgov.org](mailto:CEPDProp65@acgov.org)

District Attorney, Inyo County  
PO Drawer D  
Independence, CA 93526-0604  
[inyoda@inyocounty.us](mailto:inyoda@inyocounty.us)

San Diego City Attorney's Office  
1200 3rd Avenue, STE  
1620 San Diego, CA 92101  
[CityAttyCrimProp65@sandiego.gov](mailto:CityAttyCrimProp65@sandiego.gov)

Michelle Latimer, Program Coordinator Lassen County  
220 S. Lassen Street  
Susanville, CA 96130  
[mlatimer@co.lassen.ca.us](mailto:mlatimer@co.lassen.ca.us)

Eric J. Dobroth, Deputy District Attorney San Luis Obispo County  
County Government Center Annex, 4 FL  
San Luis Obispo, CA 93408  
[edobroth@co.slo.ca.us](mailto:edobroth@co.slo.ca.us)

Yen Dang, Supervising Deputy District Attorney Santa Clara County  
70 W. Hedding St.  
San Jose, C 95110  
[EPU@da.sccgov.org](mailto:EPU@da.sccgov.org)

Jeffrey S. Rosell, District Attorney Santa Cruz County  
701 Ocean Street  
Santa Cruz, CA 95060  
[Prop65DA@santacruzcounty.us](mailto:Prop65DA@santacruzcounty.us)

Stephan R. Passalacqua, District Attorney Sonoma County  
600 Administration Dr  
Sonoma, CA 95403  
[jbarnes@sonoma-county.org](mailto:jbarnes@sonoma-county.org)

Phillip J. Cline, District Attorney Tulare County  
221 S. Mooney Blvd  
Visalia, CA 95370  
[Prop65@co.tulare.ca.us](mailto:Prop65@co.tulare.ca.us)

Gregory D. Totten, District Attorney Ventura County  
800 S. Victoria Ave.  
Ventura, CA 93009  
[daspecialops@ventura.org](mailto:daspecialops@ventura.org)

San Francisco, City Attorney  
1 Dr Carlton B Goodlett PL Ste  
234 San Francisco, CA 94102-  
[4604.valerie.lopez@sfcityatty.org](mailto:4604.valerie.lopez@sfcityatty.org)

District Attorney, Santa Barbara County  
1112 Santa Barbara Street  
Santa Barbara, CA 93101  
[DAProp65@co.santa-barbara.ca.us](mailto:DAProp65@co.santa-barbara.ca.us)

District Attorney, Calaveras County  
891 Mountain Ranch Road  
San Andreas, CA 95249  
[Prop65Env@co.calaveras.ca.us](mailto:Prop65Env@co.calaveras.ca.us)

San Jose City Attorney's Office 200  
East Santa Clara Street, 16th Floor  
San Jose, CA 95113-1903  
[cao.main@sanjoseca.gov](mailto:cao.main@sanjoseca.gov)

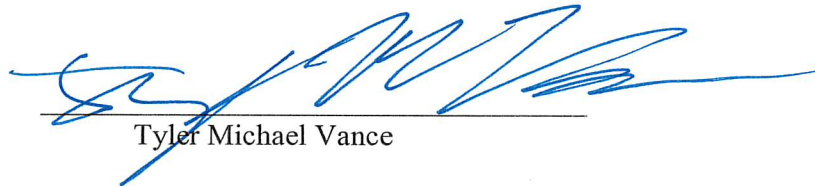
Additionally,

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 Service List below and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by First Class Mail.

Executed on 4/22/22, in Fontana, California.

  
Tyler Michael Vance

**Service List**

District Attorney, Orange County  
401 West Civic Center Drive  
Santa Ana, CA 92701-4515

District Attorney, Alpine County  
P.O. Box 248  
Markleeville, CA 96120-0248

District Attorney, Amador  
County  
708 Court Street, Suite 202  
Jackson, CA 95642-2153

District Attorney, Butte County  
25 County Center Drive# 245  
Oroville, CA 95965-3370

District Attorney, Sutter County  
463 2nd Street  
Yuba City, CA 95991-5524

District Attorney, Colusa County  
346 Fifth Street Suite 101  
Colusa, CA 95932-2413

District Attorney, Del Norte  
County  
450 H Street, Room 171  
Crescent City, CA 95531-4021

District Attorney, El Dorado  
County  
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