

# SIXTY-DAY NOTICE OF VIOLATION

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SENT IN COMPLIANCE WITH CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)

**DATE:** July 21, 2022

**TO:** Andy Jassy, CEO – Amazon.com, Inc.  
California Attorney General's Office  
District Attorneys and Certain City Attorneys Throughout California

**FROM:** Paul Wozniak

My name is Paul Wozniak. I am a citizen of the State of California acting in furtherance of the public interest. I seek to promote awareness of exposures to certain toxic chemicals in products sold in California and, if possible, to improve human health by reducing hazardous substances contained in such items. 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, this letter is also being provided to the alleged violator, Amazon.com, Inc., which is a person in the course of doing business in California (Violator). The violations covered by this notice consist of the product exposure, routes of exposure and types of harm potentially resulting from exposure to the hazardous substance identified below (listed chemical), as follows:<sup>1</sup>

Products:	Solder Wire Containing Lead, Including Kits Containing Such Items
Listed Chemical:	Lead
Routes of Exposure:	Inhalation, Ingestion and Dermal
Types of Harm:	Birth Defects and Other Reproductive Harm

## **I. NATURE OF ALLEGED VIOLATION (CONSUMER PRODUCT EXPOSURE)**

Lead-based solder wires that are causing consumer exposures, in violation of Proposition 65, and that are covered by this letter shall be referred to hereinafter as the “Products.” Exposures to the listed chemical from the use of the Products have been occurring without the “clear and reasonable warning” required by Proposition 65, dating as far back as July 21, 2019. Without proper warnings regarding the toxic effects of exposures to the listed chemical resulting from the use of 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 identified toxicant.

California citizens, through the act of buying, acquiring, receiving or utilizing the Products, are exposed to the listed chemical. By way of example, consumers, workers and other individuals, including women of childbearing age, ingest the listed chemical when they, among other activities, touch the Products and transfer the listed chemical from the Products to their mouths through hand-to-mouth activities that may continue to occur for a significant period after one or more contacts with the Products ceases.

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<sup>1</sup> The violations exclude sales made by third-party sellers on amazon.com that have settled their disputes with Mr. Wozniak. This exclusion, however, does not include sales of the same ASIN on amazon.com sold by any other entity besides the settling merchant.

Additionally, consumers, workers and other individuals, including women of childbearing age, are exposed to the listed chemical through direct dermal contact when they, among other activities, handle, touch or otherwise use the Products. Further, there are reasonably foreseeable uses of the Products that result in direct ingestion and inhalation.

The California State Plan for Occupational Safety and Health incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions with regard to occupational exposures on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California so long as they are based in the United States. The approval also provides that a United States employer may use the means of compliance in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement be subject to the supervision of the California Occupational Safety and Health Administration.

Any settlement, civil complaint or substantive court orders in this matter must be submitted to the state Attorney General.

## **II. CONTACT INFORMATION**

Please direct all questions concerning this notice to me through my counsel's office at the following address, email and/or telephone number:

Paul Wozniak  
c/o Clifford A. Chanler  
Chanler, LLC  
72 Huckleberry Hill Road  
New Canaan, CT 06840-3801  
clifford@chanlerllc.com  
Telephone: (203) 594-9246

## **III. PROPOSITION 65 INFORMATION**

For general 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. For the Violator's reference, I have attached a copy of "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary" which has been prepared by OEHHA.

#### **IV. POTENTIAL RESOLUTION OF NOTICED CLAIMS**

Based on the assertions set forth in this notice, I intend to file a citizen enforcement action (or amend any existing one that may be filed before the expiration of this sixty-day letter) against the Violator unless such alleged person in the course of doing business enters into a binding written agreement (and/or upstream party such as a supplier enters into an agreement which would resolve allegations pertaining to one or more of the products at issue) to: (a) recall Products already sold or undertake best efforts to ensure that the requisite health hazard warnings are provided to those who have received such Products; (b) provide “clear and reasonable warnings” for Products to be sold in the future or, preferably, reformulate such Products to eliminate potential exposures to lead (or undertake best efforts to ensure upstream selling entities in the chain of commerce such as manufacturers, exporters, importers or distributors do so); and (c) pay an appropriate civil fine based on the factors enumerated in California Health & Safety Code §25249.7(b). If the alleged Violator is interested in resolving this dispute without resorting to litigation, please feel free to contact my counsel identified in Section II above. It should be noted that neither my counsel nor I can finalize any settlement with the Violator until after the statutory sixty-day notice period has expired for the covered products; nor speak for the state Attorney General, any state district attorney or the five city attorneys who received this notice.

#### **V. ADDITIONAL NOTICE INFORMATION**

Examples of Products that were purchased and/or available for purchase or use in California covered by this notice are identified on Exhibit A.<sup>2 3</sup>

The examples on the attachment are for the recipient’s benefit to assist in its investigation of, among other things, the magnitude of potential exposures to the listed chemical from other items within the definition of Products. These examples are not meant to be an exhaustive or comprehensive identification of each specific offending Product. Further, the alleged Violator is obligated to continue to conduct in good faith an investigation into all lead-based solder wire described above that may have been manufactured, imported, distributed, facilitated for sale, sold, shipped, stored, or was otherwise within the notice recipient’s custody or control during the relevant period so as to ensure that the requisite toxic warnings were and continue to be provided to California citizens prior to purchase, especially if the upstream vendor (i.e., party with whom the Violator entered into a contract to sell the products at issue) is exempt from a duty to warn or enforcement under Proposition 65.

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<sup>2</sup> If an applicable manufacturer, supplier, seller, exporter and/or importer of one or more of the Products does not have a known agent for process of service in California or employs less than ten people as defined by the operative regulation, then the Violator has heightened regulatory responsibilities beyond 27 CCR §25600.2(d) especially if the Violator is also an importer or fulfills additional upstream roles in the commercial marketplace.

<sup>3</sup> In accordance with 27 CCR §25600.2(g), please promptly answer the questions on **Exhibit B**, and return with receipt confirmation to Paul Wozniak c/o Clifford Chanler, Chanler, LLC, 72 Huckleberry Hill Road, New Canaan, CT 06840, or via email to clifford@chanlerllc.com on or before **August 20, 2022**.

## Exhibit A

<b>Products</b>	<b>Model#/UPC#/Item ID</b>
Activity 60/40 Tin Lead Solder Wire with Rosin for Electrical Soldering Flux 2.0% 1lb/454g 0.039"/1.0mm, <i>As illustrated in Exhibit B</i>	B07Y9YRLWQ
63-37 Tine Lead Rosin Core Solder Wire for Electrical Soldering (0.8mm 100g), 2 pcs Soldering Wick No-Clean Solder Braid Wick Desoldering Wick (2.5cm wisth. 1.5m Lemgth). 2 Pcs Soldering Sponge,	B08C2ZZFX5; B08C2F8N6R
Forney Solder Rosin 1/8", 16 oz.	B003X3VUDM
QJZXUEZHEN 60/40 Lead Solder Wire with Rosin for Electrical Repair Soldering Purpose (various sizes)	B096FQ4SPP; B096FPTBTQ; B096FQFKXF
Tamington Solder Wire Sn63 Pb37 with Rosin Core for Electrical Soldering 50g (0.8mm)	B072WN1DMG
J&F Rosin Core Solder 63/37 Leaded Electronics Solder (various sizes)	B00QQZBA7A/SL-1K-08; B00914JQDI/SL-12-08; B07XKWB1RR/SL-50-03; B07XKWFKWC/SL-100-05; B007N6R9E4/FBA_SL-100-06; B007N6RQC4/SL-100-06
Fpxnb 2 Pack 60-40 Tin Lead Rosin Core Solder Wire Set for Electrical Soldering and DIY 0.8mm 100g,	B089VWK89L/HJ-HS-08MM
TIPZAP 60-40 Tin Lead Rosin Core Solder Wire for Electrical Soldering (1.0mm 100g),	B08D9QD3R3
Forney Solder Rosin 1/8", 16 oz.	B003X3VUDM
RF4 63-37 Tin Lead Rosin Core Solder Wire for Electrical Soldering + Soldering Wire Storage Box,	B09126PVCQ; B0912CXJ2Z

<b><i>Products</i></b>	<b><i>Model#/UPC#/Item ID</i></b>
KAINA 1.0mm Solder Wire 63/37 Tin Lead Tin Wire Solder Rosin Core Solder Flux Soldering Welding,	B07RLN5NHX/4035546326884; B07RKYVY7C/4035546326907; B07RDN1DQ7/4035546326891; B07RFPC1S1/4035546326877; B07RDN1MN2/4035546326914
Forney Solder Rosin 1/8", 16 oz.	B003X3VUDM
TUDEPROC 63-37 Tin Lead Rosin core solder wire for electrical soldering	B08RJXYGS6; B08RJZV5QB; B08RK14F6T; B08RJZ56J4
Nathan Trotter 60/40 Solder for stained glass - 1 lb. spool /.125" dia.	B0851RNSHY
Sywon 60-40 Tin Lead Rosin Core Solder Wire 0.039" 50g for Electrical Soldering and DIYs	B01LVTTL9E
Forney Solder Rosin 1/8", 16 oz.	B003X3VUDM
Alpha Fry AM13460 Rosin Core Solder	B002YDR1Y4
CYEAH 3 PCS 60/ 40 Solder Wire, 0.6mm 1 00g Tin Lead Solder Wire, Rosin Core Solder Wire for Electrical Repair Soldering Purpose (100g/0.22lbs)	B09L18L9PB
Victory White Metal Stained Glass Solder, 60/40 16 Ounce	B00WGZJQ8E
3 Pack Solder Wire Tube with Flux Rosin Core Tin Lead in Storage Tube for Electronics Soldering DIY Work, 0.3mm, 0.4mm, 0.5mm	B07P7WX7F3
Alpha Fry AM13463 Rosin Core Electric Solder	B002YCN9H8
Soldering Iron Kit Electronics, Soldering Iron 60W Adjustable Temperature, Solder Wire, Wire Stripper, Desoldering Pump, Tweezers, Solder Tips, Mini Stand, Screwdrivers, Heatshrink Tubes from Plusivo	B07XKZVG8Z

<b><i>Products</i></b>	<b><i>Model#/UPC#/Item ID</i></b>
Amerway 60/40 Solder for Stained Glass 5 Pound (5 rolls)	B07BXT863M
83-4000-0000 SN60PB40 Solder Pocket Pack, 0.031" Wire Diameter	B00068IJNQ
1 Pack 63-37 Tin Lead Rosin Core Solder Wire for Electrical Soldering Diameter 0.8mm 50g	B09L7MD1WY
FRIZNO SOLDER WIRE 63 37 TIN LEAD FOR ELECTRICAL SOLDERING ROSIN CORE SOLDER (1mm 100g)	B099NRQG7V
TOWOT Solder Wire with Rosin Core, 3 PCS Tin Lead Rosin Core Flux Iron Welding Tool for Electrical Soldering (various sizes)	B09JBKSHCT B09JBHYVLR B09JBKCF72
Alpha Metals 13463 .5oz Electric Repair Solder	B000G33P9E
VEVOR Tin Lead Solder, 60/40 Solder, Sn60 Pb40 Solder Wire, 0.125"/3.175 mm Soldering Wire, 1lb Electrical Solder, 60/40 Solder For Stained Glass, 40 60 Solder Core, 60 40 Solder W/Silver White Color	B096WT6T3W
BOHOOLS 63/37 Rosin Core Solder Wire, Tin Lead Soldering Wire for Electrical Soldering, Premium Electronic Solder with Low Melting Point (various sizes)	B09QG6SRJR B09QG6SSG8
60-40 Tin Lead Rosin Core Solder Wire for Electrical Soldering	B09L6QVXD2 B09D42GXQK B09D42PF3Q B0917L6SNB B0917LYYCY B09L6RFFMK
Alpha Metals 13463 .5oz Electric Repair Solder	B000G33P9E

<b>Products</b>	<b>Model#/UPC#/Item ID</b>
YI LIN 60/40 Solder Tin Lead Rosin Core Solder Wire For Electrical Soldering (various sizes)	B09LYD5JGZ B08RHMPJW3 B09LYFYWTW B08RHWJVDP B09LYBJ2VN B08RDQR8DQ
Miyako Usa Tin Lead Rosin Core Solder Wire for Electrical Soldering. Contains 1.8% Solder flux Sn60-Pd40-1 lbs Round Spool (454g) 0.8mm Diameter. (60/40)	B09V3CBD83
CHENXI 63/37, Great Quality Tin Lead Solder Wire With Rosin Core Low Temp, Diameter 0.031" 0.8mm, Net 1.8oz 50g, Wire Solder For Electrical Soldering	B08HYWFYFC
TOWOT 63-37 High Purity Tin Lead Rosin Core Solder Wire for Electrical Soldering, Content 1.8% Solder flux (1.0mm, 50g)	B09KM2LW4G B09KM213N7 B09KM31DQ9 B09KM1W7MW B09KM3BXJL B09KM28JT2 B09KM1SL3K
0.031" Wire Diameter Solder Pocket Pack	B08TMCM7G9
Alpha Fry AM13463 Rosin Core Electric Solder	B002YCN9H8
Solder Wire 60/40 Rosin Core in Tube Dispenser for Easy Repair Soldering	B004LY20G8
Chip Quik NC25W.015 2oz Solder Wire 60/40 Tin/Lead (Sn60/Pb40) No-Clean .015 2 oz	B099XBVBPG
Jammas 0.3mm Fine Solder Wire 60/40 1.2% Flux Reel Tube Tin Lead Rosin Core Soldering	B07RVJJ86B
TOWOT Tin Lead Rosin Core Solder Wire for Electrical Soldering, Content 1.8% Solder flux Sn60-Pb40 (1.0mm, 50g)	B0943RVQ5W

<b><i>Products</i></b>	<b><i>Model#/UPC#/Item ID</i></b>
Alpha Fry AM13463 Rosin Core Electric Solder	B00S04P18Y
Solder Wire and Rosin Paste Flux Kit - 60-40 Tin Lead Rosin Core Solder Wire (1mm) and Rosin Paste Flux for PCB Electrical Soldering and DIY from Plusivo	B08BL46XZB B08BLSJHW1
10-in-1 Soldering Iron Kit from BOHOOLS, Premium Soldering kit for Electrical soldering, Electronic, Wire, Guitar, Jewelry: Adjustable Temperature 60W 110V Soldering gun, 5pcs Solder Tips, Solder Wire	B09K49BHNC
Indium 52487-0454 60/40 RA Wire Solder, 2.7-3.2% Core .050in. 1lb.	B016L5QWFO
Alpha Fry AM51406 Rosin Core Solder	B002YDLW1C
Liyafy 250g Rosin Core Flux 60/40 Solder Soldering Iron Wire Reel for Electrical repair And DIY (various sizes)	B07WD7B8D8 B07WFBYGRQ B07WMGC58B B07WJKF4Z9
PETTYOLL 3PCS 0.6mm Tin Lead Rosin Core Solder Wire, 60/40 Tin Lead Solder Wire for Electrical Repair Soldering Purpose (100g/0.22lbs)	B097RD7WMY
Parts Express Electronic Solder 60/40 0.8mm (0.031") Diameter 1 lb. Spool	B00DHHAZ3A
Alpha Fry AM31604 60/40 Electrical Rosin Core Solder	B002YDR23E
LDK Soldering Iron Kit Electric 60W 110V Adjustable Temperature Soldering Gun Welding Tools, 5pcs Replacement Tips, 30g 0.8mm Solder Wire, Heavy Duty Holder, Cleaning Sponge, Solder Paste	B0811D2L3L
Solder Wire, 0.8mm 60/40 Tin Lead Rosin Core Solder for Electrical Soldering (100g/0.22lbs)	B0987TY8CR



<b><i>Products</i></b>	<b><i>Model#/UPC#/Item ID</i></b>
Youland Soldering Iron Tip Cleaner + 60/40 Solder Wire Reel Fine 0.6mm Tin Lead Rosin Core (1.76oz/50g) + Soldering Rosin Flux Paste Gel (0.35oz/10g) for Electronics Metalworking Welding	B07V96LW7Z B07V66QKJZ
AZB Solder Wire 63-37 Solder Wire 3 Rolls of Tin Lead Rosin Core, 0.8mm Solder Wire with Rosin for Electrical Soldering (0.8mm / 100g)	B09PYB9SZJ
AxPower 5 Packs 63-37 Tin Lead Rosin Core Solder Wire for Electrical Soldering 50g Diameter 0.5mm 0.6mm 0.8mm 1.0mm 1.2mm (5 PCS)	B081JQL5PQ
GeToo Solder Wire - Get 1 Premium Tweezer for Free, Sn63/Pb37 Tin Lead Alloy Soldering Wire with Rosin Core for Electrical Soldering, 100g (0.22lbs)	B083KD24BY B083KCJ5M7 B083KDSTBP
2 Pack Solder Wire Tin Lead Rosin Core 60-40 Fine Soldering Wire Reel (0.6mm,50g) + Solder Rosin Flux Paste Gel (0.35oz/10g) Kits for Electronics Repairs and Soldering DIY	B07Y5GBP3W
60/40 Rosin Core Solder Wire, 0.6mm and 1.0mm Tin Lead Rosin Core Solder for Stained Glass, Electronics, Gauge Wires, Jewelry, Electric Toys and Models,( 50g)	B07FFPWWR3
ANOTEK Solder Wire 60/40 Solder Wire Tin Lead Rosin Core, 0.6mm and 1.0mm Solder Wire with Rosin for Electrical Soldering and DIY(0.6mm and 1.0mm/ 50g)	B07VLLF8FM
Pocket Pack Solder 60/40 0.031 0.50 oz. Tube, 2 Pack	B00J41PX5S
BOHOOLS 63/37 Rosin Core Solder Wire, Tin Lead Soldering Wire for Electrical Soldering, Premium Electronic Solder with Low Melting Point (various sizes)	B09K47W3DR B09K46VP21

<b><i>Products</i></b>	<b><i>Model#/UPC#/Item ID</i></b>
Lhcsi 63/37 Solder Wire, Tin Lead Rosin Core Solder Wire for Electrical Soldering (various sizes)	B08ZKG8DBJ B08NG59J4K B08LGMSYNJ
Fine Solder Wire Rosin Core Tin Lead Electrical Soldering Leaded Electronics Soldering Wiring 63 37 0.8mm 200g 0.032 Thin Diameter Electric Solders	B08P54F3P2
Tin Lead Solder Wire Rosin Core Electrical Solder Wiring Electronics Soldering Wire Leaded Electric Solders Flux Core Low Melting Temperature Sn 63 Pb 37 1.1 Pound 0.8mm 500g 0.032 inch	B08P54DDYC
yueton Tin Lead Rosin Core Solder 63/37 Active Solder Wire With Resin Core for Electrical Repair Soldering Purpose in 1.8 oz 0.6mm	B07H1DLZ18
Berkling Tin Lead 60/40 Rosin Core Solder Wire, High Quality, Low Melting Point, Great For Soldering Electrical Wire, PCB, Home DIY, Computer, Electronic (various sizes)	B08L61K2HX B09274R93J B09274LWTP B08L5XYMJF B08L5WV37K B092722P79 B08L5YLYR7 B09272SFDJ B08L5ZHVB5 B08L5YXGL4
CHENXI Great Rosin Core Solder Wire - Tin 63% Lead 37%, Pocket Pack, Diameter 0.031" 0.8mm, Net Weight 0.35oz 10g, Sn63 - Pb37 For Electrical Work Soldering Tools (10-pack)	B08JP7WT1G B08J7P75JK B08J7Z8QXQ
Cardas Soldering Wire Quad Eutectic Silver Solder with rosin flux 1/4 lbs (113g) roll	B015X68HXW
yzc Rosin core solder-Solder wire 63-37 Solder flux, Electronic solder, diameter 1MM, net weight 20G, portable storage tube, suitable for electronics, circuit boards, ICs, etc. DIY(Rosin core solder)	B097DXCVFQ

<b>Products</b>	<b>Model#/UPC#/Item ID</b>
VEVOR 60/40 Tin Lead Solder, 25PCS Sn60 Pb40 Solder Wire, 0.125"/3.175 mm Soldering Wire, 1LB/453G Electrical Solder, 60/40 Solder For Stained Glass, Silver Solder Core for Electrical Soldering	B096WTFMX5
Canfield 60/40 solder for stained glass	B004P4H9CE B096YYDGL7
MG Chemicals 4894-227G/4894-454G 60/40 Rosin Core Leaded Solder, 0.025" Diameter Spool	B005T8N8B6 B005T8MVNW
SONEAK 60/40 Tin Lead Solder With Rosin Core For Electrical Soldering (various sizes)	B084SSZVR3 B084RZWVXY B084S1XXJZ B084S13Z6T B084RZF23H B084S18GKF B084SV6NT7
WMORE Soldering Tin Wire 50g 0.6mm 0.8mm 1.0mm 1.2mm 1.5mm 2.0mm Rosin Core Solder Wire for Electrical Soldering and DIY (1.5mm)	B08TTJ4TX1 B08TTK71VH B08TTT9RK3 B08TT3TBDH B08TTCD3X9
MG Chemicals 4890 60/40 Rosin Core, Leaded Solder Wire Pocket Pack, 0.81mm/0.032" Dia. 2 Pocket Packs	B071JHLT8Q
welding tool set, 60/40 Solder Wire Reel Fine 0.6mm (0.35 oz) + Soldering Rosin Flux Paste Gel (0.35 oz), no-clean soldering core wick(2.0mm, 29.5 inches), 0.6mm kit	B096FXRF6T
Ahier Solder Tip Cleaner+ Soldering Rosin Flux Paste(0.35 oz / 10 g)+ 60/40 Tin Lead Rosin Core Solder Wire(1.76 oz / 50 g) + 3pcs Replacement Brass Pads, 6 PCS Solder Iron Welding Tool Set	B091SWJ7S5
ALPHA METALS AM13505 Series 16 OZ.125 Diameter Spool General Purpose, Solid Wire Solder	B000G35LXC

## EXHIBIT B

As it relates to *each* of the Products, including those identified on **Exhibit A**, provide the full legal entity name and any known contact information (on or before **August 20, 2022**) for:

- (a) Any and all manufacturers
- (b) Any and all producers
- (c) Any and all packagers
- (d) Any and all direct vendors
- (e) Any and all exporters
- (f) Any and all shippers, and
- (g) Any and all sellers

Please email (or send via overnight delivery) the above-requested information to the address provided in Section II. Thank you.

# PROOF OF SERVICE

I, the undersigned, declare under penalty of perjury:

I am over the age of 18 years and not a party to the within action. I am a resident or employed in the county where the mailing occurred. My business address is 72 Huckleberry Hill Road, New Canaan, CT 06840.

On **July 25, 2022**, I caused to be served the following documents:

**SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE §25249.7(d);**

**CERTIFICATE OF MERIT; AND**

**THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY**

XXXX **By First Class Certified Mail** through the United States Postal Service by placing true and correct copies of the above documents in a sealed envelope, addressed to each alleged violator listed below and providing such envelope to a United States Postal Service Representative.

Andy Jassy, CEO  
Amazon.com, Inc.  
410 Terry Avenue N  
Seattle, WA 98109

On **July 25, 2022**, I caused to be served the following documents:

**SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE §25249.7(d); AND**

**CERTIFICATE OF MERIT**

XXXX **By Mail** I placed a true and correct copy of the foregoing document(s) in a sealed envelope addressed to each entity on the attached "Mail Service List." I placed each such envelope, with postage thereon fully prepaid, for collection and mailing in one of the United States Post Office Boxes located at 18 Locust Avenue, New Canaan, Connecticut.

On **July 25, 2022**, I caused to be served the following documents:

**SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH  
HEALTH & SAFETY CODE §25249.7(d); AND**

**CERTIFICATE OF MERIT**

XXXX **By Electronic Mail** by sending true and correct copies of the above documents to the electronic notification (Email) address(es) on the attached “Email Service List” and “Mail Service List.”

On **July 25, 2022**, I caused to be served the following documents:

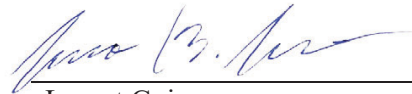
**SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH  
HEALTH & SAFETY CODE §25249.7(d);**

**CERTIFICATE OF MERIT; AND**

**CERTIFICATE OF MERIT ATTACHMENTS**

XXXX **By Electronic Upload** by causing true and correct copies of the above documents to be uploaded to the California Attorney General’s website at the web address on the attached “Electronic Upload Service List.”

Executed on **July 25, 2022**, in New Canaan, Connecticut.



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Lorent Guimaraes

# CERTIFICATE OF MERIT

California Health & Safety Code Section 25249.7(d)

I, Clifford A. Chanler, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice has 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 *alleged* exposure to the listed chemical that is the subject of this action and/or the listed chemical in substantially similar products and exposes individuals through the same potential routes;
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 Violator will be able to establish any of the affirmative defenses set forth in the statute;
5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate under Health and Safety Code §25249.7(h)(2) including (i) the identity of the persons consulted with and relied on by the certifier, and (ii) certain facts, studies, or other data reviewed by those persons.

Dated: July 21, 2022

  
Clifford A. Chanler