## 60-DAY NOTICE OF VIOLATION OF CALIFORNIA HEALTH & SAFETY CODE § 25249.7(d) (PROPOSITION 65)

Date: May 22, 2023
To: Lilly Ghalichi, Chief Executive Officer, Lilly Lashes, LLC; California Attorney General's Office; District Attorney's Office for 58 Counties; and City Attorneys for San Francisco, San Diego, San Jose, Sacramento & Los Angeles
From: Keep America Safe and Beautiful

## I. <u>INTRODUCTION</u>

Keep America Safe and Beautiful is a California nonprofit corporation acting in the interest of the general public, pursuant to California Health & Safety Code § 25249.7(d). Keep America Safe and Beautiful seeks to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve human health by eliminating hazardous substances contained in such items, promoting corporate responsibility.

This 60-Day Notice of Violation ("**Notice**") is being provided to the alleged violator, Lilly Lashes, LLC ("**Notice Recipient**"), as well as the California Attorney General's Office, the District Attorney's Offices for 58 Counties, and City Attorneys for San Francisco, San Diego, San Jose, Sacramento, and Los Angeles.

Keep America Safe and Beautiful provides this Notice after identifying violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, codified at California Health & Safety Code § 25249.5 *et seq.* ("**Proposition 65**"), based on the failure to provide a clear and reasonable health hazard warning in connection with the sale or use of the products, listed below, in the State of California. The Notice Recipient is hereby given notice it violated and continues to violate Proposition 65 with respect to the warning requirement, codified at California's Health & Safety Code § 25249.6: "No person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first giving a clear and reasonable warning to such individual." Without proper warnings about the toxic effects of exposures to listed chemicals, citizens in California lack the information necessary to make an informed decision as to whether or how to eliminate or reduce their risk of exposure from the reasonably foreseeable use of products containing listed chemicals.

## II. NATURE OF ALLEGED VIOLATIONS

**<u>Product</u>**. The specific type or category of products ("**Products**") that are the subject of this Notice are as follows:

Exemplar Product	Category/Type	Retailer	Manufacturer/Distributor
Gold Cosmetic Bag with	Bags with Vinyl	Lilly Lashes	Lilly Lashes, LLC
Lash Applique	Components	lillylashes.com	
Item No. LLAC35			

Identified above is a specific example of Products recently purchased and witnessed as being available for sale or use in the State of California, within the *category* of offending products

covered by this Notice. The identified retailers, manufacturers and/or distributors of the Products are based on publicly available information.

The Exemplar Product is identified for the Notice Recipient's benefit to assist in its investigation into the alleged violations that are the subject of this Notice. The specific identified Exemplar Product is not intended to be an exhaustive list of all such products potentially in violation of Proposition 65. It is Keep America Safe and Beautiful's position the Notice Recipient is now obligated to conduct a good faith investigation into other products within the category or of the type, identified above, that were manufactured, imported, sold or distributed for sale, or that have otherwise been in the Notice Recipient's custody or control during the relevant period, identified below, to ensure the requisite health hazard warnings are provided to individuals in California prior to purchase.

**Listed Chemical.** The chemical that is the subject of this Notice is diisononyl phthalate ("**DINP**"). The State of California listed DINP as a chemical known to cause cancer on December 20, 2013.

**Routes of Exposure.** The exposures subject to this Notice result from the purchase, acquisition and handling of Products containing DINP. Exposures occur when individuals handle, touch or otherwise utilize bags with vinyl components containing DINP in accordance with the Products' reasonably foreseeable and intended uses, resulting in exposures through ingestion and dermal absorption. Individuals ingest DINP when they touch or handle the Products, transferring the chemical from their fingers or hands to their mouths. Dermal absorption of DINP occurs when individuals handle, touch, or utilize the Products in accordance with their reasonably foreseeable and intended uses.

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. The approval also provides that an employer may use the means of compliance in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

**Violations and Time Period of Exposure.** Keep America Safe and Beautiful alleges the Notice Recipient knowingly and intentionally exposed, and continues to knowingly and intentionally expose, individuals within the State of California to DINP, without first giving a health hazard warning regarding the chemical's toxic effects, as required by Proposition 65.

Exposures caused by the use of the Products have occurred each day since the Products were introduced into the California marketplace, but, at a minimum, since May 22, 2022, and, potentially, as far back as May 22, 2020. Because the Products lack clear and reasonable warnings regarding the toxic effects of exposures to DINP, each Product sold during this period and not accompanied by a warning constitutes a violation by the Notice Recipient and/or other sellers of the Products, whether sold directly through retailers located in, or with locations in, California, via the internet, or through catalog purchases by customers and individuals located in California. Moreover, these exposures are ongoing and will continue either until clear and

reasonable warnings are provided to protect consumers and users or until this known toxic chemical is removed from the Products or reduced to allowable levels.

## III. <u>RESOLUTION OF NOTICED CLAIMS</u>

Consistent with the public interest goals of Proposition 65, Keep America Safe and Beautiful seeks to pursue a constructive resolution of this matter to quickly rectify ongoing violations of California law. To that end, based on the allegations set forth in this Notice and pursuant to Health & Safety Code § 25249.7(d), Keep America Safe and Beautiful intends to file a private enforcement action in the public interest sixty (60) days after effective service of this Notice, unless the appropriate public enforcement agencies have commenced and are diligently prosecuting an action to rectify these allegations. If the Notice Recipient seeks to resolve the claims alleged in this Notice without litigation, it may contact Keep America Safe and Beautiful's counsel at the address listed below.

It should be noted neither Keep America Safe and Beautiful or its counsel can: (1) finalize any settlement until after the expiration of the 60-day Notice period; or (2) speak for the California Attorney General or any District or City attorney in receipt of this Notice. Therefore, while reaching an agreement with Keep America Safe and Beautiful will satisfy its claims, the agreement may not satisfy any public prosecutors.

## IV. GENERAL INFORMATION AND SUMMARY OF PROPOSITION 65

A copy of a summary of Proposition 65's provisions, prepared by the Office of Environmental Health Hazard Assessment ("**OEHHA**") is enclosed with the copy of the Notice served on the Notice Recipient for its reference. For further general information concerning Proposition 65, contact OEHHA's Proposition 65 Implementation Office at (916) 445-6900.

## V. <u>CERTIFICATE OF MERIT</u>

Pursuant to Health & Safety Code § 25249.7(d) and Cal. Code. Regs. tit 11, § 3100, a Certificate of Merit is attached hereto. A copy of the Notice and Certificate of Merit is served on the California Attorney General and marked "Attorney General Copy: Contains Official Information Pursuant to Evidence Code Section 1040" with all supporting documentation, as required by Cal. Code. Regs. tit 11, § 3102, attached thereto.

## VI. <u>CONTACT INFORMATION</u>

Please direct all questions, issues or communications regarding this 60-Day Notice of Violation and its potential resolution to Keep America Safe and Beautiful's counsel at the following address:

Keep America Safe and Beautiful c/o Laralei Paras, Esq. Seven Hills LLP 4 Embarcadero Center, Suite 1400 San Francisco, California 94111 Telephone: (415) 926-7247 Email: laralei@sevenhillsllp.com

<u>Attachments:</u> Certificate of Merit; Proof of Service; The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary (to Violator(s) only); and Additional Confidential Supporting Information for Certificate of Merit (to AG only.)

Printed on 100% Post-Consumer Recycled Paper.

### **CERTIFICATE OF MERIT**

Health and Safety Code § 25249.7(d)

Re: Keep America Safe and Beautiful's Notice of Proposition 65 Violations

- I, Laralei Paras, hereby declare and certify:
- 1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice violated California Health & Safety Code § 25249.6 by failing to provide clear and reasonable warnings.
- 2. I am an attorney for the noticing party.
- 3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies or other data regarding the alleged exposure to and the lack of warnings for the listed chemical that is the subject of the notice.
- 4. Based on the information obtained through those consultations and on 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 noticing party'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, including the information identified in California Health & Safety Code § 25249.7(h)(2), i.e., 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: May 22, 2023

Laralei Paras

### PROOF OF SERVICE

I, the undersigned, declare under penalty of perjury:

I am over the age of 18 years of age and not a party to this case. Seven Hills LLP's business address is 4 Embarcadero Center, Suite 1400, San Francisco, CA 94111.

On May 22, 2023, I caused to be served the following:

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

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

#### **CERTIFICATE OF MERIT**

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

Lilly Ghalichi, CEO Lilly Lashes, LLC 1256 Main Street, Suite 256 Southlake, TX 76092 Lilly Lashes, LLC c/o CSC – Lawyers Incorporating Service 2710 Gateway Oaks Dr Ste 150N Sacramento, CA 95833

On May 22, 2023, I caused to be served true and correct copies of the following documents:

# 60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE § 25249.7(d); and

### **CERTIFICATE OF MERIT**

XXXX by **First Class Mail** through the United States Postal Service by placing copies of the above documents in a sealed envelope, addressed to each entity on the attached "Service List" and providing such envelope to a United States Postal Representative, with correct postage.

XXXX via **Electronic Mail**, by sending copies of the above documents, addressed individually, to the Recipient listed on the attached "Electronic Mail Service List".

On May 22, 2023, I caused to be served true and correct copies of the following documents:

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

### **CERTIFICATE OF MERIT; and**

### **CERTIFICATE OF MERIT ATTACHMENTS**

XXXX via **Electronic Mail**, by uploading the documents, addressed to California Attorney General at their website address, listed under the "Electronic Upload Service List". Executed on the 22<sup>nd</sup> day of May 2023, at Folsom, California.

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## **SERVICE LIST**

The Honorable Michael Atwell	The Honorable Jackie Lacey	The Honorable Todd Riebe
Alpine County District Attorney	Los Angeles County District Attorney	Amador County District Attorney
P.O. Box 248	211 West Temple Street, Ste 1200	708 Court Street, #202
Markleeville, CA 96120	Los Angeles, CA, 90012	Jackson, CA 95642
The Honorable Michael Ramsey		Del Norte County District Attorney
Butte County District Attorney	Colusa County District Attorney	450 H street, Room 171
25 County Center Drive, Suite 245	346 5th Street, Suite 101	Crescent City, CA 95531
Oroville, CA 95965	Colusa, CA 95932	
The Honorable Vern Pierson	The Honorable Gilbert Otero	The Honorable Dwayne Stewart
	Imperial County District Attorney	Glenn County District Attorney
778 Pacific Street	940 West Main Street, Suite 102	P.O. Box 430
Placerville, CA 95667	El Centro, CA 92243	Willows CA 95988
The Honorable Maggie Fleming	The Honorable Donald Anderson	The Honorable Lisa Green
Humboldt County District Attorney	Lake County District Attorney	Kern County District Attorney
825 5 <sup>th</sup> Street, 4 <sup>th</sup> Floor	255 N. Forbes Street	1215 Truxtun Avenue
Eureka, CA 95501	Lakeport, CA 95453	Bakersfield, CA 93301
The Honorable Keith Fagundes	The Honorable Mike Feuer	The Honorable David Linn
Kings County District Attorney 1400	Office of the City Attorney, Los Angeles	Madera County District Attorney
West Lacey Blvd.	Kames K. Hahn Hall East	209 West Yosemite Avenue
Hanford, CA 93230	200 North Main Street, 8th Floor	Madera, CA 93637
	Los Angeles, CA 90012	
The Honorable Edward Berberian	The Honorable Todd Spitzer	The Honorable C. David Eyster
Marin County District Attorney	Orange County District Attorney	Mendocino County District Attorney
3501 Civic Center Drive, Room 130	300 North Flower Street	P.O. Box 1000
San Rafael, CA 94903	Santa Ana, CA 92703	Ukiah, CA 9548
The Honorable Birgit Fladager	The Honorable Candace Hooper	The Honorable Tim Kendall
Stanislaus County District Attorney	San Benito District Attorney	Mono County District Attorney
832 12th street, Suite 300	419 4th Street	P.O. Box 2053
Modesto, CA 95353	Hollister, CA 95023	Mammoth Lakes, CA 93546
The Honorable Stephen Wagstaffe	The Honorable Michael Ramos	The Honorable Stephanie Bridgett
San Mateo County District Attorney	San Bernardino County District Attorney	
400 County Center, Third Floor	303 W. Third Street	1355 West Street
Redwood City, CA 94063	San Bernardino, CA 92415	Redding, CA 96001
The Honorable James Kirk Andrus	The Honorable Krishna Abrams	The Honorable Amanda Hopper
Siskiyou County District Attorney	Solano County District Attorney	Sutter County District Attorney
P.O. Box 986	675 Texas Street, Suite 4500	446 Second Street, Suite 102
Redding, CA 96097	Fairfield, CA 94533	Yuba City, CA 95991
The Honorable Laura Krieg	The Honorable James Sanchez	The Honorable Eric Heryford
Tuolumne County District Attorney		Trinity County District Attorney
423 N. Washington Street	915 I Street, 4 <sup>th</sup> Floor	P.O. Box 310
Sonora, CA 95370	Sacramento, CA 95814	Weaverville, CA 96093
The Honorable Lawrence Allen	The Honorable Gregg Cohen	The Honorable Patrick McGrath
Sierra County District Attorney	Tehama County District Attorney	Yuba County District Attorney
100 Courthouse Square	P.O. Box 519	215 Fifth street, Suite 152
Downieville, CA 95936	Red Bluff, CA 96080	Marysville, CA 95901
The Honorable Jordan Funk		19101 yovinc, CA 93701
Modoc County District Attorney		
204 S. Court Street Room 202		
Alturas, CA 96101	l	

### **ELECTRONIC MAIL SERVICE LIST**

Alameda County District Attorney         San Joaquin County District Attorney         Sacramento County District Attorney           776 Oakport Street, Suite 650         222. E. Weber Avenue, Room 202         901 G Street           Sacramento, C.A. 95814         DAConsumer Environmental@sicda.org         Prop5@sacda.org           Data County District Attorney         Santa Cruz County District Attorney         San Diego Computer Stephan           Napa County District Attorney         Santa Cruz County District Attorney         San Diego Computer Stephan           Napa, CA. 94559         Santa Cruz, CA 95060         San Diego CAPUPO5@adda.org           The Honorable Jeff W. Reisig         Michelle Latimer, Program Coordinator         Mark Ankcorn, Deputy City Attorney           Yolo County District Attorney         Sus Sanville, CA 96130         San Diego, CA 92101           Cepd@yolocounty.org         mlatimer@co.lassen.eu.a.us         City AttyProp5@sandiego.gov           Bud Porter         Alethea M. Sargent         Christopher Dalbey,           Supervising Deputy District Attorney         San Francisco. District Attorney Santa Barbara County           The Honorable Gregory D. Totten,         The Inonorable Santa Barbara, CA 9310           Santa Barbara County         Santa Francisco, CA 94103         Santa Barbara, CA 9310           The Honorable Gregory D. Totten,         The Hononable Barbara Yook         Henry Lifton, Dep			
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Oakland, CA 94621         Stockton, CA 95202         Sacramento, CA 95814           CEPDProp55@asqda.org         DAConsumer.Environmental@aioa.org         Prop55@asqda.org           The Honorable Allison Haley         The Honorable Jeffrey S. Rosell         The Honorable Summer Stephan           Napa County District Attorney         Santa Craz County District Attorney         300 West Broadway           Napa, CA 94559         Santa Craz, CA 9500         San Diego, CA 94509           CEPD@county/ofnapa.org         Prop65DA@santacruzcounty, us         San Diego, CA 94509           Soll Second Street         220 S. Lassen Street         I200 Third Avenue           Woodland, CA 95695         Susanville, CA 96130         San Diego, CA 92101           Steped@iyolocounty.org         malitime@co.lassen.ea. aus         City AttyProp65@asndiego.gov           Bud Porter         Alethea M. Sargent         Christopher Dalbey,           Supervising Deputy District Attorney         San Francisco District Attorney's Office         Santa Barbara County           San Jose, CA 9510         San Francisco, CA 94103         Santa Barbara, CA 93101           EPU@da scegov.org         Lalethea.asrget@gav.org         DAProp65@casint-barbara.ca.us           Ventura, CA 93009         San Andreas, CA 95249         Sant Francisco, CA 94102           Ventura, CA 93009         San Andreas, CA 95249			
CEPDProp65@acquiv.org         DAConsumer.Environmental@iscda.org         Prop65@acquiv.org           The Honorable Allison Haley         The Honorable Jeffrey S. Rosell         The Honorable Summer Stephan           Napa County District Attorney         San Diego County District Attorney         San Diego County District Attorney           Napa CA 94595         Santa Cruz, CA 95060         San Diego, CA 92101           CEPD@acountyOfnapa.org         Prop65DAd@santacruzcounty.us         SanDiego.CA 92101           Street         Ligot Mark Ankcorn, Deputy City Attorney         City of San Diego           Yole County District Attorney         Lassen County         City of San Diego           Street         Li200 Third Avenue         Biogo Ca 92101           Supervising Deputy District Attorney         San Francisco District Attorney's Office         Santa Barbara Street           Supervising Deputy District Attorney         San Francisco, CA 94103         Santa Barbara Street           San Jong Street         San Francisco, CA 94103         Santa Barbara Street           San Jong Street         San Francisco, CA 94103         Santa Barbara Ca 03101           PU@das accgov.org         DaProp65@cacs.org         DaProp65@cacs.org           Sant Street         Santa Barbara Street         Santa Barbara Ca 03101           Supuervising Deputy District Attorney         San Francisco,	· ·		
The Honorable Allison Haley         The Honorable Jeffrey S. Rosell         The Honorable Summer Stephan           Napa County District Attorney         Santa Cruz County District Attorney         San Diego County District Attorney           127 First St., Suite C         701 Ocean Street         B00 West Broadway           San Diego County District Attorney         San Diego County District Attorney           CIPPD@county ofnapa.org         Prop65DA@stanteruzcounty.us         San Diego County Origo AProp65@staded.org           Ol Second Street         220 S. Lassen Street         1200 Third Avenue           Woodland, CA 95695         Susanville, CA 96130         San Diego, CA 92101           Fepd@zyolcounty.org         naltimer@co.lassen.ca.us         CityAttryProp5@stantego.org           Bud Porter         Alethea M. Sargent         Christopher Dalbey,           San Jose, CA 95110         San Francisco, CA 94103         Santa Barbara County           70 W Hedding Street         350 Rhode Island Street         1112 Santa Barbara Street           801 Osc, CA 95110         San Francisco, CA 94103         Santa Barbara, CA 93101           EPU@da.sccgov.org         DAProp65@co.santa-barbart.ca.us           The Honorable Gregory D. Totten,         The Honorable Barbara Yook         Herry Lifnon, Deput City Attorney           Vontura Costa Avenue         S01 Nobratin Ranch Road         San			
Napa County District Attorney         Santa Cruz County District Attorney         San Diego County District Attorney           1127 First St, suite C         701 Ocean Street         300 West Broadway           Napa, CA 94559         Santa Cruz, CA 95060         San Diego DAProp5@deda.org           The Honorable Leff W. Resig         Michelle Latimer, Program Coordinator         Mark Ankcorn, Deputy City Attorney           Yoo County District Attorney         Lasen County         Lasen County         Lasen County           Yoo County District Attorney         Lasen County         Lasen County         Lity of San Diego, CA 92101           cfepd@yolocounty.org         Inlatimer/discolassen.ca.us         CityAttyProp5@desandiego.gov         Deputy District Attorney           Sunat Clara County         Assistant District Attorney's Office         Santa Barbara County         Santa Francisco, CA 94103           San Soe, CA 95110         San Francisco, CA 94103         Santa Barbara County         Santa Barbara County           PU@das accegov.org         JAProp65@dec.santa-barbara.ca.us         The Honorable Barbara Yook         Henry Lifkon, Deputy City Attorney           Robey Suctoria Avenue         San Andreas, CA 95249         San Francisco, CA 94102         San Francisco, CA 94102           Aspecialop@dventura.org         Prop65Env@doc.ca.aus         Prop65@decistyatty.org         San Francisco, CA 94102 <t< td=""><td></td><td></td><td></td></t<>			
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Napa, CA94559Santa Cruz, CA95060San Diego, CA92101CEPD@countyofnapa.orgProp65DA@santacruzcounty.usSanDiegoDAProp65@sdcda.orgThe Honorable Jeff W. ReisigMichelle Latimer, Program CoordinatorYole County District AttorneyLassen CountyCity of San Diego, CA92101301 Second Street200 S. Lassen Street1200 Third AvenueWoodland, CA95695Susanville, CA96130San Diego, CA92101Supervising Deputy District AttorneyAssistant District Attorney's OfficeSanta Barbara, CA93104Supervising Deputy District AttorneySan Francisco, CA94103Santa Barbara CountySanta Barbara, CA95101San Francisco, CA94103Santa Barbara, CA95101San Francisco, CA94103Santa Barbara, CA95101Santa Barbara, CA93101PU@das.cegov.orgDAProp65@co.santa-barbara.ca.usThe Honorable Barbara YookHenry Lifton, Deputy City AttorneyVentura County District AttorneyCalaveras County District AttorneyOffice of the City AttorneyVentura, CA93009San Andreas, CA95249San Francisco, CASaney GrassiniEric J. DobrothJeannine M. PacioniDeputy District AttorneyDeputy District AttorneyDonterey County900 Ward StreetCounty Govt Center Annex, 4* Floor1200 Aquajto RoadMartinez, CA9532San Luis Obispo CountyMonterey Causity900 Ward StreetCounty Govt Center Annex, 4* Floor1200 Aquajto RoadM			
CÉPD@countyofnapa.org         Prop65DA@santacruzcounty.us         SanDiegoDAProp65@sdcda.org           The Honorable Jeff W. Reisig         Michelle Latimer, Program Coordinator         Mark Ankcorn, Deputy City Attorney           301 Second Street         220 S. Lassen Street         1200 Thind Avenue           Woodland, CA 95695         Susanville, CA 96130         San Diego, CA 92101           Ecped@yolcocunty.org         mlatimer(?aco.lassen.ca.us         City AttyProp65@sandiego.gov           Bud Porter         Alethea M. Sargent         Christopher Dalbey,           Supervising Deputy District Attorney         Santa Barbara County         Santa Barbara County           70 W Hedding Street         350 Rhode Island Street         1112 Santa Barbara County           70 W Hedding Street         350 Rhode Island Street         1112 Santa Barbara County           80 Soc A 95110         San Francisco, CA 94103         Santa Barbara, CA 93101           EPU@da.sccgov.org         DAProp65@co.santa-barbara.ca.us         Herny Lifton, Deputy City Attorney           800 S Victoria Avenue         891 Mountain Ranch Road         130 Market Street, 7e Floor           800 S Victoria Avenue         891 Mountain Ranch Road         130 Market Street, 7e Floor           Stacey Grassini         Eric J. Dobroth         Jeamine M. Pacioni           Deputy District Attorney         Deputy Distr			
The Honorable Jeff W. Reisig         Michelle Latimer, Program Coordinator         Mark Ankcorn, Deputy City Attorney           Yolo County District Attorney         Lassen County         City of San Diego         San Diego, City of San Diego           301 Second Street         220 S. Lassen Street         1200 Third Avenue         San Diego, CA 92101           cfepd@yolocounty.org         matimer@co.lassen.ca.us         City AttyProp65@sandiego.gov           Bud Porter         Alethea M. Sargent         Christopher Dalbey,           Spanta Clara County         San Francisco District Attorney's Office         Santa Barbara County           70 W Hedding Street         350 Rhode Island Street         1112 Santa Barbara County           8an Francisco, CA 94103         Santa Barbara, CA 93101         Santa Barbara, CA 93101           PU@da.sccgov.org         DAProp65@co.santa-barbara.ca.us           The Honorable Gregory D. Totten,         The Honorable Barbara Yook         Herry Lifton, Deputy City Attorney           Ventura, CA 93009         San Andreas, CA 95249         San Francisco, CA 94102         Sprop65@scleinyaty.org           Stacey Grassini         Eric J. Dobroth         Jeannine M. Pacioni         Deputy District Attorney           Vontar Costa County         San Luis Obispo County         Montreey Caugito Road         Montreey Caugito Road           Nove County District Attorney <td></td> <td></td> <td></td>			
Yolo County District Attorney       Lassen County       City of San Diego         301 Second Street       220 S. Lassen Street       1200 Third Avenue         Woodland, CA 95695       Susanville, CA 96130       San Diego, CA 92101         cfipd@yolocounty.org       mlatimer@co.lassen.ca.us       CityAttProp56@sandiego.gov         Bud Porter       Alethea M. Sargent       Christopher Dalbey,         Supervising Deputy District Attorney       San Francisco District Attorney's Office       Santa Barbara County         San Jose, CA 95110       San Francisco, CA 94103       Santa Barbara Street         San Jose, CA 95110       San Francisco, CA 94103       Santa Barbara Street         Sulda.sccgov.org       DAProp6@co.santa-barbara.ca.us       DPtrop6@co.santa-barbara.ca.us         Ventura County District Attorney       Calaveras County District Attorney       San Francisco, CA 94102         Ventura, CA 93009       San Andreas, CA 95249       San Francisco, CA 94102       Prop65@geschiyatly.org         Stacey Grassini       Eric J. Doboth       Jeannine M. Pacioni       Deputy District Attorney         Oothreey County       San Luis Obispo County       Monterey, CA 93940       Sar Luis Obispo County         Martinez, CA 94553       San Luis Obispo, CA 93408       Monterey, CA 93940       Sar Sar Caustrey, CA 93940       Sar Luis Obispo, CA 93408       Mo	CEPD@countyofnapa.org	Prop65DA@santacruzcounty.us	SanDiegoDAProp65@sdcda.org
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cfepd@yolocounty.org         Inlatimer@co.lassen.ca.us         CityAttyProp65@sandiego.gov           Bud Porter         Alethea M. Sargent         Christopher Dalbey,           Supervising Deputy District Attorney         San Francisco District Attorney'         Santa Clara County           San La Clara County         San Francisco, CA 94103         Santa Barbara County           San Jose, CA 95110         San Francisco, CA 94103         Santa Barbara, CA 93101           EPU@da.sccgov.org         DAProp65@co.santa-barbara.ca.us           The Honorable Gregory D. Totten,         The Honorable Barbara Yook         Herry Lifton, Deputy City Attorney           Ventura County District Attorney         891 Mountain Ranch Road         1390 Market Street, 7* Floor           Stacey Grassini         Eric J. Dobroth         Jeannine M. Pacioni           Deputy District Attorney         Deputy District Attorney         Deputy District Attorney           900 Ward Street         County Govt Center Annex, 4* Floor         1200 Aguajito Road           Martinez, CA 94553         San Luis Obispo, CA 93408         Monterey, CA 93940           Sparsisnii/Govands Street         211 S Mooney Blvd         Neeted           Invo David Street         County Govt Center Annex, 4* Floor         1200 Aguajito Road           Martinez, CA 94553         San Luis Obispo, CA 93408         Prop65@civaudout <td>301 Second Street</td> <td></td> <td></td>	301 Second Street		
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EPU@da.sccgov.org         alethea.sargent@sfgov.org         DAProp65@co.santa-barbara.ca.us           The Honorable Gregory D. Totten,         The Honorable Barbara Yook         Henry Lifton, Deputy City Attorney           Ventura County District Attorney         Calaveras County District Attorney         Office of the City Attorney           800 S Victoria Avenue         891 Mountain Ranch Road         1390 Market Street, 7* Floor           Ventura, CA 93009         San Andreas, CA 95249         San Francisco, CA 94102           daspecialops@ventura.org         Prop65Env@co.calaveras.ca.us         Prop65@sfcityatty.org           Stacey Grassini         Eric J. Dobroth         Jeannine M. Pacioni           Deputy District Attorney         Deputy District Attorney         Monterey County           900 Ward Street         County Govt Center Annex, 4* Floor         1200 Agaujito Road           Martinez, CA 94553         San Luis Obispo. CA 93408         Monterey, CA 93940           sgrassini@contracostada.org         edobroth@co.slo.ca.us         Prop65DA@co.onnoterey.ca.us           The Honorable Thomas Hardy         The Honorable Phillip J. Cline         The Honorable Clifford Newell           Inyo County District Attorney         Tulare County District Attorney         Nevada County District Attorney           Independence, CA 93526         Visalia, CA 95370         Nevada City, CA 95959 <tr< td=""><td></td><td>San Francisco, CA 94103</td><td>Santa Barbara, CA 93101</td></tr<>		San Francisco, CA 94103	Santa Barbara, CA 93101
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### **ELECTRONIC UPLOAD SERVICE LIST**

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