



Klamath

ENVIRONMENTAL
LAW CENTER

June 29, 2023

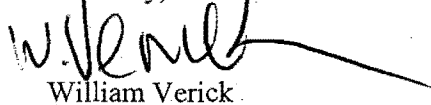
PROPOSITION 65 ENFORCEMENT REPORTING
ATTENTION: PROP 65 COORDINATOR
1515 CLAY STREET, SUITE 2000
P.O. BOX 70550
OAKLAND CA 94612-0550

ATTORNEY GENERAL COPY
CONTAINS OFFICIAL
INFORMATION PURSUANT TO
EVIDENCE CODE §1040

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") hereby provide notice that the business entities ("companies") listed on the accompanying Service List have been, are, will be and threaten to be in violation of Cal. Health & Safety Code §25249.6. These companies own brands such as Tiffany & Company and Baccarat. They also own retail stores in California that also use the Tiffany & Company or Baccarat brands and/or trademarks. At these retail stores, these companies sell leaded crystal. These companies are the manufacturers, importers and retail marketers of fine drinkware that contains lead that these companies cause to be sold at the California retail stores the companies own. This office and Mateel are both private enforcers of Proposition 65, both organizations may be reached at the below-listed address and telephone number, I may be considered a "responsible individual" at both organizations, and I may be contacted at the same address and telephone number. The above referenced violations occur when these companies market crystal glass serve ware and drink ware, the glass for which, contains lead. Examples of such drink ware and serve ware include decanters, carafes, tumblers, wine glasses, champagne flutes, and cocktail glasses (as for martinis) (collectively hereinafter "Products at Issue"). Ingesting food or beverages stored in or served from the Products at Issue exposes the people who do so to lead and lead compounds, (hereinafter, collectively, "lead"). Lead leaches from the Products at Issue into the food or beverage stored in, or served from, them. The food or beverage is then consumed and the accompanying lead ingested. These exposures occur via the ingestion route of exposure. The Californians so exposed do not receive a clear and reasonable warning within the meaning of Cal. Health & Safety Code § 25249.6. These violations have occurred every day since at least June 28, 2020, and will continue every day until reasonable warnings are given to those people exposed or until LVMH stops selling leaded crystal.


Cordially,


William Verick

CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. 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 the action. 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 violator will be able to establish any of the affirmative defenses set forth in the statute. 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 Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: June 29, 2023

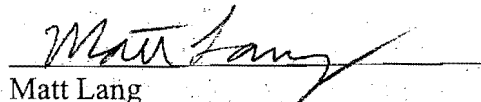


William Verick

CERTIFICATE OF SERVICE

I, Matt Lang, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 1125 Sixteenth Street, Suite 204, Arcata, California, 95521. On June 29, 2023, I caused the attached NOTICE OF VIOLATION LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached NOTICE OF VIOLATION and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 29, 2023, at Arcata, California.



Matt Lang

SERVICE LIST

PROPOSITION 65 ENFORCEMENT REPORTING
ATTENTION: PROP 65 COORDINATOR
1515 CLAY STREET, SUITE 2000
POST OFFICE BOX 70550
OAKLAND, CA 94612-0550
(via the internet per request)

OAKLAND CITY ATTORNEY
CITY HALL 6TH FLOOR
1 FRANK OGAWA PLAZA
OAKLAND, CA 94612

OFFICE OF THE CITY ATTORNEY
CITY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

OFFICE OF THE CITY ATTORNEY
CITY OF SACRAMENTO
915 I STREET, 4TH FLOOR
SACRAMENTO, CA 95814-2608

OFFICE OF THE CITY ATTORNEY
CITY OF SAN JOSE
200 EAST SANTA CLARA STREET, 16TH FL
SAN JOSE, CA 95113

OFFICE OF THE CITY ATTORNEY
CITY OF LOS ANGELES
200 N. MAIN ST. #800
LOS ANGELES, CA 90012

OFFICE OF THE CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, SUITE 1100
SAN DIEGO, CA 92101
(via the internet per request)

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF ALAMEDA
1225 FALLON STREET STE 900
OAKLAND, CA 94612
(via the internet per request)

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF ALPINE
P.O. BOX 248
MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF AMADOR
708 COURT STREET
JACKSON, CA 95642

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF BUTTE
25 COUNTY CENTER DR. STE 245
OROVILLE, CA 95965

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF CALAVERAS
891 MOUNTAIN RANCH ROAD
SAN ANDREAS, CA 95249

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF COLUSA
316 SIXTH STREET
COLUSA, CA 95932

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF CONTRA COSTA
900 WARD ST
MARTINEZ, CA 94553

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF DEL NORTE
450 H ST #171
CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF EL DORADO
778 PACIFIC STREET
PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF FRESNO
2100 TULARE ST
FRESNO, CA 93721

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF GLENN
P.O. BOX 430
WILLOWS, CA 95988

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF HUMBOLDT
825 5TH ST.
EUREKA, CA 95501

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF IMPERIAL
940 W. MAIN STREET, SUITE 102
EL CENTRO, CA 92243-2880

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P.O. DRAWER D
INDEPENDENCE, CA 93526

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1215 TRUXTUN AVE. FLOOR 4
BAKERSFIELD, CA 93301

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COUNTY OF KINGS
1400 W. LACEY BLVD.
HANFORD, CA 93230

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375 3RD ST
LAKEPORT, CA 95453

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SUSANVILLE, CA 96130

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MADERA, CA 93637

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3501 CIVIC CENTER DR STE 145
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MARIPOSA, CA 95338

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COUNTY OF MENDOCINO
PO BOX 1000
UKIAH, CA 95482

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550 W MAIN ST
MERCED, CA 95340

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204 SOUTH COURT STREET, SUITE 202
ALTURAS, CA 96101

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COUNTY OF MONO
P.O. BOX 617
BRIDGEPORT, CA 93517

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142 W. ALISAL STREET, SUITE A
SALINAS, CA 93901

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COUNTY OF NAPA
1127 FIRST STREET, SUITE C
NAPA, CA 94559

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COUNTY OF NEVADA
201 COMMERCIAL STREET
NEVADA CITY, CA 95959

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COUNTY OF ORANGE
300 NORTH FLOWER STREET
SANTA ANA, CA 92703

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ROSEVILLE, CA 95678

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419 4TH ST
HOLLISTER, CA 95023

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303 W 3RD ST
SAN BERNARDINO, CA 92415

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SAN DIEGO, CA 92101

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350 RHODE ISLAND STREET
NORTH BUILDING, SUITE 400N
SAN FRANCISCO, CA 94103

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STOCKTON, CA 95202

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1035 PALM ST
SAN LUIS OBISPO, CA 93408

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SAN JOSE, CA 95110

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COUNTY OF SANTA CRUZ
701 OCEAN ST. #200
SANTA CRUZ, CA 95060

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1355 WEST STREET
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675 TEXAS ST. STE 4500
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832 12TH ST
MODESTO, CA 95354

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463 SECOND ST
YUBA CITY, CA 95991

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444 OAK ST, ROOM L
RED BLUFF, CA 96080

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P.O. BOX 310, 11 COURT ST.
WEAVERVILLE, CA 96093

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VISALIA, CA 93291

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VENTURA, CA 93009

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WOODLAND, CA 95695

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LVM CB HOLDINGS, INC.
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PARSIPPANY, NJ 07054