

SIXTY-DAY NOTICE OF VIOLATION

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

DATE: November 22, 2023

TO: King Chan, CEO – Dragonmarts Company Limited
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 consumer 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, Dragonmarts Company Limited, which has acknowledged in writing that it is a person in the course of doing business for purpose of Proposition 65 (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:

Products:	Soldering Wire
Listed Chemical:	Lead
Routes of Exposure:	Inhalation, Ingestion and Dermal
Types of Harm:	Cancer, Birth Defects and Other Reproductive Harm

I. NATURE OF ALLEGED VIOLATION (CONSUMER PRODUCT EXPOSURE)

Lead-based soldering wire that have caused 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. 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, 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. Additionally, consumers 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/or inhalation. In a separate communication, the Violator has admitted that the Products cause the alleged exposures.

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 shall be submitted/uploaded onto the state Attorney General’s portal as may be required by law.

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:

Primary Contact:

Steven Y. Chen
Steven Y. Chen, APLC
2650 River Avenue, Unit A
Rosemead, California 91770
Telephone: (626) 782-5017
schen@schenlaw.com

Secondary Contact:

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

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.

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.

On **November 22, 2023**, 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 Electronic Mail** by sending a true and correct copy of the foregoing documents at the electronic mail address shown below:

King Chan, CEO
Dragonmarts Company Limited
1111, 11/F Metroplaza Tower 2
223 Hing Fong, Hong Kong
info@dragonmarts.com

On **November 22, 2023**, 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 addresses on the attached "Email Service List."

On **November 22, 2023**, 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 **November 22, 2023**, in Rosemead, California.



Steven Chen

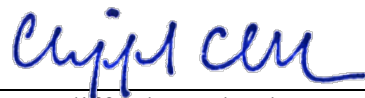
CERTIFICATE OF MERIT

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 one of the attorneys 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 notice and/or the listed chemical in substantially similar products sold through one or more downstream sellers of the Products including amazon.com;
4. Based on the information obtained through those consultations and 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 citizen’s claims can be established. Further, the Violator has expressly waived any exemptions under California Health & Safety Code §25249.6 *et seq.* and agreed to accept electronic service of this 60-Day Notice of Violation at the email address noted in the Proof of Service above. The Violator further waived any argument that the Products do not expose individuals to lead and that any affirmative defense exists under California Health & Safety Code §25249.10(c);
5. A copy of this Certificate of Merit served on the Attorney General references the factual and legal 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: November 22, 2023



Clifford A. Chanler

EMAIL SERVICE LIST

The Honorable Todd Riebe
Amador County District Attorney
708 Court Street
Jackson, CA 95642
amadorda@amadorgov.org

The Honorable Michael Ramsey
Butte County District Attorney
25 County Center Drive, Suite 245
Oroville, CA 95965
DA@ButteCounty.net

Michelle Latimer
Lassen County Program Coordinator
220 S. Lassen Street
Susanville, CA 96130
mlatimer@co.lassen.ca.us

The Honorable David Hollister
Plumas County District Attorney
520 Main Street, Room 404
Quincy, CA 95971
davidhollister@countyofplumas.com

The Honorable Lisa Smittcamp
Fresno County District Attorney
2220 Tulare Street, Suite 1000
Fresno, CA 93721
damail@fresnocountyca.gov

The Honorable Maggie Fleming
Humboldt County District Attorney
825 5th Street, Fourth Floor
Eureka, CA 95501
districtattorney@co.humboldt.ca.us

Nancy O'Malley, District Attorney
Alameda County
7776 Oakport Street, Suite 650
Oakland, CA 94621
CEPDPProp65@acgov.org

Allison Haley, District Attorney
Napa County
1127 First Street, Suite C
Napa, CA 94559
CEPD@countyofnapa.org

The Honorable Phillip J. Cline
Tulare County District Attorney
221 South Mooney Boulevard
Visalia, CA 93291-4593
Prop65@co.tulare.ca.us

The Honorable Tori Verber Salazar
San Joaquin County District Attorney
P.O. Box 990
222 E. Weber Avenue, Room 202
Stockton, CA 95201
DAConsumer.Environmental@sjcda.org

The Honorable Clifford Newell
Nevada County District Attorney
201 Commercial Street
Nevada City, CA 95959
DA.Prop65@co.nevada.ca.us

The Honorable Summer Stephan
San Diego County District Attorney
330 West Broadway Street
San Diego, CA 92101
SanDiegoDAProp65@sdcda.org

The Honorable Donna Daly
Trinity County District Attorney
P.O. Box 310
11 Court Street
Weaverville, CA 96093
trinityjournal@dcacable.net

The Honorable Sally O. Moreno
Madera County District Attorney
209 West Yosemite Avenue
Madera, CA 93637
Sally.Moreno@co.madera.ca.gov

The Honorable Thomas Hardy
Inyo County District Attorney
P.O. Box Drawer D
Independence, CA 93526
inyoda@inyocounty.us

Henry Lifton, Deputy City Attorney
Office of the City Attorney, San Francisco
1390 Market Street, 7th Floor
San Francisco, CA 94102
Prop65@sfcityatty.org

The Honorable C. David Eyster
Mendocino County District Attorney
100 North State Street, Room G-10
P.O. Box 1000
Ukiah, CA 95482
enviroh@mendocinocounty.org

The Honorable Kimberly Lewis
Merced County District Attorney
550 West Main Street
Merced, CA 95340
Prop65@countyofmerced.com

The Honorable Samuel D. Kyllö
Modoc County District Attorney
204 South Court Street, Suite 202
Alturas, CA 96101
da@co.modoc.ca.us

The Honorable Tim Kendall
Mono County District Attorney
278 Main Street
P.O. Box 617
Bridgeport, CA 93517
districtattorney@mono.ca.gov

The Honorable Jeannine M. Pacioni
Monterey County District Attorney
1200 Aguajito Road
Monterey, CA 93940
Prop65DA@co.monterey.ca.us

The Honorable Jill R. Ravitch
Sonoma County District Attorney
600 Administration Drive
Sonoma, CA 95403
jbarnes@sonoma-county.org

Mark Ankcorn, Deputy City Attorney
Office of the City Attorney, San Diego
1200 Third Avenue, Suite 1620
San Diego, CA 92101
CityAttyProp65@sandiego.gov

Jeff W. Reisig, District Attorney
Yolo County
301 Second Street
Woodland, CA 95695
cfepd@yolocounty.org

The Honorable Jason Anderson
San Bernardino County District Attorney
303 West 3rd Street, 6th Floor
San Bernardino, CA 92415-0502
da@sbcda.org

Alexandra Grayner, Assistant DA
San Francisco District Attorney's Office
350 Rhode Island Street N. Bldg., 400N
San Francisco, CA 94103
alexandra.grayner@sfgov.org

The Honorable Laura L. Krieg
Tuolumne County District Attorney
423 North Washington Street
Sonora, CA 95370
da@tuolumnecounty.ca.gov

Stacey Grassini, Deputy District Attorney
Contra Costa County
900 Ward Street
Martinez, CA 94553
sgrassini@contracostada.org

The Honorable Susan J. Kronos
Lake County District Attorney
255 North Forbes Street
Lakeport, CA 95453
Susan.Kronos@lakecountyca.gov

The Honorable Jeffrey S. Rosell
Santa Cruz County District Attorney
701 Ocean Street, Room 200
Santa Cruz, CA 95060
Prop65DA@santacruzcounty.us

The Honorable Sandra Groven
Sierra County District Attorney
100 Courthouse Square, Room B1
P.O. Box 457
Downieville, CA 95936
sgroven@sierracounty.ca.gov

The Honorable Walter Wall
Mariposa County District Attorney
5085 Bullion Street
P.O. Box 730
Mariposa, CA 95338
mcdam@mariposacounty.org

Christopher Dalbey, Deputy District Attorney
Santa Barbara County
1112 Santa Barbara St.
Santa Barbara, CA 93101
DAProp65@co.santa-barbara.ca.us

The Honorable Barbara Yook
Calaveras County District Attorney
891 Mountain Ranch Rd.
San Andreas, CA 95249
Prop65Env@co.calaveras.ca.us

Paul E. Zellerbach, District Attorney
Riverside County
3072 Orange Street
Riverside, CA 92501
Prop65@rivcoda.org

The Honorable Cynthia Zimmer
Kern County District Attorney
1215 Truxtun Avenue, 4th Floor
Bakersfield, CA 93301
CZimmer@kernda.org

The Honorable Gregory D. Totten
Ventura County District Attorney
800 South Victoria Avenue, Suite 314
Ventura, CA 93009
daspecialops@ventura.org

The Honorable Anne Marie Schubert
Sacramento County District Attorney
901 G Street
Sacramento, CA 95814
Prop65@sacda.org

The Honorable Morgan Briggs Gire
Placer County District Attorney
10810 Justice Center Drive, Suite 240
Roseville, CA 95678
Prop65@placer.ca.gov

The Honorable Richard Doyle
Office of the City Attorney, San Jose
200 East Santa Clara Street, 16th Floor
San Jose, CA 95113
cao.main@sanjoseca.gov

The Honorable James Kirk Andrus
Siskiyou County District Attorney
311 4th Street
Yreka, CA 96097
da@siskiyouda.org

Bud Porter, Supervising Deputy District Attorney
Santa Clara County
70 West Hedding Street
San Jose, CA 95110
EPU@da.sccgov.org

Eric J. Dobroth, Deputy District Attorney
San Luis Obispo County
County Govt Center Annex, 4th Floor
San Luis Obispo, CA 93408
edobroth@co.slo.ca.us

The Honorable Susan Alcala Wood
Office of the City Attorney, Sacramento
915 I Street, 4th Floor
Sacramento, CA 95814
clerk@cityofsacramento.org

The Honorable Krishna A. Abrams
Solano County District Attorney
675 Texas Street, Suite 4500
Fairfield, CA 94533
SolanoDA@solanocounty.com

ELECTRONIC UPLOAD SERVICE LIST

Office of the California Attorney General
Proposition 65 Enforcement Reporting
ATTN: Prop 65 Coordinator
P.O. Box 70550
Oakland, CA 94612-0550
<https://oag.ca.gov/prop65/add-60-day-notice>