

May 22, 2024

## 60-DAY NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT

Dear Alleged Violators and Appropriate Enforcement Agencies<sup>1</sup>:

This office represents Ramy Eden (“Claimant”) who serves this Notice of Violation (“Notice”) pursuant to California Health & Safety Code section 25249.7(d). This Notice serves to inform you that the Alleged Violators identified below (“Alleged Violators”) are in violation of California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (“Proposition 65”) codified at Cal. Health & Safety Code § 25249.5, *et seq.*

Claimant has identified violations of Proposition 65 with respect to the consumer product identified below (“Product”). In violation of Cal. Health & Safety Code § 25249.6, the Product exposes individuals to lead (referred to herein as “lead” or the “Listed Chemical”), which is known to the State of California to cause, *inter alia*, developmental and reproductive toxicity, without first giving a clear and reasonable warning of such exposure. Without these warnings, California citizens lack the information necessary to make informed decisions as to whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable exposure to and/or use of the Product.

Claimant is a citizen of the State of California who is acting in the interest of the general public to promote awareness of exposures to toxic chemicals from use of consumer products sold in California and to improve human health and the environment by reducing hazardous substances. Claimant intends to bring a private enforcement action, pursuant to Cal. Health & Safety Code §25249.7(d), to address these violations. Claimant is represented by the undersigned and may be contacted through the undersigned at the telephone number and address set forth in the letterhead above.<sup>2</sup>

### **Description of Violations:**

**Alleged Violators:** The Alleged Violators that are the subject of this Notice are those identified in Exhibit 1 below.

**Time Period of Exposure:** Violations have been occurring since at least May 22, 2021 and are continuing to this day.

**Listed Chemical:** Lead, which is listed by the State of California under Prop. 65 as being known to cause *inter alia*, developmental toxicity, male reproductive toxicity, and female reproductive toxicity.

**Product:** The Product that is the subject of this Notice is identified in Exhibit 1 below.

**Description of Exposure:** The use of the Product results in human exposure to lead. The primary route of lead exposure to consumers is through direct ingestion when consumers eat the Product. These exposures take place throughout the State of California and no clear or reasonable warning regarding such exposures is provided.

### **Prop. 65 Information:**

For the reference of the Alleged Violators, a copy of the Office of Environmental Health Hazard Assessment’s *The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary* is being provided to the Alleged Violators.

### **Evidence Preservation Request to Alleged Violators:**

***Alleged Violators are hereby requested to preserve any and all evidence relating to the violations described herein.*** This includes, without limitation, preserving exemplars of the Product and any accompanying

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<sup>1</sup> The public enforcement agencies are those public agencies identified in the attached proof of service.

<sup>2</sup> Claimant’s mailing address and telephone number are: 1286 University Ave. #1052, San Diego, CA 92103; 619-752-4862. However, as indicated above, Claimant is represented by counsel and requests to only be contacted through the undersigned.

warning materials and all communications regarding warning materials concerning the Product. For any Alleged Violator who is a “Retail Seller”<sup>3</sup> this also includes, without limitation, documenting (through photography and/or video recording) the **present** existence, content, and location of all warning materials—including labels, shelf signs, tags, and Internet warning language—in their retail stores and websites that the Retail Seller contends provides consumers with the “clear and reasonable” warning required by Health & Safety Code section 25249.6 regarding the Product (and preserving any historical depictions of such warning materials). The failure to preserve evidence regarding the violations may result in sanctions and other penalties.

**Request for Information Concerning Source of the Product**

Pursuant to California Code of Regulations Title 27, section 25600.2, any Alleged Violator who is a “Retail Seller” is hereby requested to promptly provide the name and contact information for the manufacturer, producer, packager, importer, supplier, and distributor of the Product.

**Claims Resolution:**

To address the above-described violations, Claimant—through this law firm—intends to bring a private enforcement action against the Alleged Violators pursuant to Cal. Health & Safety Code § 25249.7(d). However, consistent with the public interest goals of Proposition 65 and the desire to have these violations of California law quickly rectified, Claimant is interested in attempting to reach an efficient and equitable resolution of these violations without protracted litigation.

Should the Alleged Violators be interested in discussing such a resolution, I welcome them to contact me at [jcharo@charolaw.com](mailto:jcharo@charolaw.com) or at the phone number or mailing address listed in the letterhead above. Please note that Claimant is represented in connection with this matter and **may only be contacted through the undersigned**.


Respectfully,

*Jarrett S. Charo*

JARRETT S. CHARO, ESQ.

Enclosures: Certificate of Merit; Proof of Service; *The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary*

**EXHIBIT 1**

Name of Alleged Violators	Product	Non-Exclusive Examples of Style, SKU, UPC, or Further Description of Product <sup>4</sup>
Marhaba International Inc.; Kalustyan Corporation	MARHABA GRAPE SEED POWDER (VITIS VIVNFERA)	

<sup>3</sup> “Retail Seller” has the same meaning as that set forth in California Code of Regulations Title 27, section 25600.1(l).

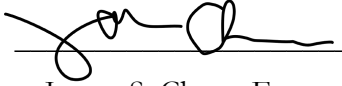
<sup>4</sup> The examples of the Product are not intended to be an exhaustive listing of each specific unit constituting the offending Product. Rather, they are provided to assist the recipients in identifying other units that comprise the offending Product.

**Certificate of Merit**

I, Jarrett S. Charo, hereby declare:

- (1) This Certificate of Merit accompanies the attached sixty-day notice(s) 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.
- (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 the 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 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 Health and Safety Code section 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.

Dated: May 20, 2024

  
Jarrett S. Charo, Esq.

## 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

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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>.

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:

***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 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.

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

## *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.

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.

If a private party alleges that a violation occurred based on one of the exposures described above, the private party must first provide the alleged violator a notice of special compliance procedure and proof of compliance form.

A copy of the notice of special compliance procedure and proof of compliance form is included in Appendix B and can be downloaded from OEHHA's website at: <http://oehha.ca.gov/prop65/law/p65law72003.html>.

*FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...*

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at [P65Public.Comments@oehha.ca.gov](mailto:P65Public.Comments@oehha.ca.gov).

Revised: May 2017

NOTE: Authority cited: Section 25249.12, Health and Safety Code. Reference: Sections 25249.5, 25249.6, 25249.7, 25249.9, 25249.10 and 25249.11, Health and Safety Code.



## Appendix A

### OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT CALIFORNIA PROTECTION AGENCY THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACTION 1986 (PROPOSITION 65): A SUMMARY

The following summary has been prepared by the office of Environmental Health Hazard Assessment, the lead and Toxic Enforcement Act 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 law. The reader is directed to the statute and its implementing regulations (See citations below) for further information.

Proposition 65 appears in California law as Health and Safety Code Sections 25249.5 through 25249.13. 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 Regulations, Sections 250000 through 27000.

#### **WHAT DOES PROPOSITION 65 REQUIRE?**

*The "Governor's List."* Proposition 65 requires the Governor to publish a list of chemicals that are known to the State of California to cause cancer, or birth defects or other reproductive harm. This list must be updated at least once a year. Over 725 chemicals have been listed as of November 16, 2001. Only those chemicals that are on the list are regulated under this law. Businesses that produce, use, release, or otherwise engage in activities involving those 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. 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. Exposures are exempt from the warning requirement if they occur less than twelve months after the date of the listing of the chemical.

***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. Discharges are exempt from this requirement if they occur less than twenty months after the date of the listing of chemical.

#### **DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?**

Yes. The law exempts:

***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.

***Exposures that pose no significant risk of cancer.*** For chemicals that are listed as known to the State to cause cancer (“carcinogens”), a warning is not required if the business 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 for more than 250 listed carcinogens.

***Exposures that will produce no observable reproductive effect at 1,000 times the level in question.*** For chemicals known to the State to cause birth defects or other reproductive harm (“reproductive toxicants”), a warning is not required if the business 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 (NOEL), “ divided by a 1,000- fold safety or uncertainty factor. The “no observable effect level” is the highest dose level which has not been associated with an observable adverse reproductive or developmental effect.

***Discharge that do not result in a “significant amount” of the listed chemical entering into 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 list chemical has not, does not, or will not enter any drinking water source, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A “significant amount” means any detectable amount; expect an amount that would meet the “ no significant risk” or “no observable effect” test if an individual were exposed to

such an 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 (those in cities with a population exceeding 750,000). Lawsuit 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. A notice must comply with the information and procedural requirements specified in regulations (Title 27. California Code of Regulations, Section 25903). A private party may not pursue an enforcement action directly under Proposition 65 if one of the governmental officials noted above initiates an action within sixty days of notice.

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 of law to stop committing the violation.

### **FOR FURTHER INFORMATION....**

Contact the Office of Environmental Health Hazard Assessment’s Proposition 65 Implementation Office at (916)445-6900

## PROOF OF SERVICE BY CERTIFIED MAIL

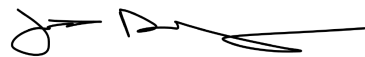
I declare that I am a citizen of the United States and a resident of the County of Placer. I am over the age of eighteen (18) and not a party to the within action. My business address is P.O. Box 740, Penryn, CA 95663.

- On May 22, 2024, I caused the following documents to be served, 60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act; Certificate of Merit; The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary, as indicated below:

SEE ATTACHED SERVICE LIST	
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- BY CERTIFIED MAIL – by placing a true and correct copy of the original thereof enclosed in a sealed envelope with postage thereon fully prepaid in the firm’s outgoing mail. A signed return receipt was requested. I am “readily familiar” with the firm’s practice of collecting and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business.
- BY HAND DELIVERY – by delivering by hand and leaving a true copy addressed to the person at the address shown above.
- BY EMAIL – by causing a true copy thereof to be electronically transmitted to the parties, by using their email address as indicated above.
- STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 22, 2024, at Penryn, California



\_\_\_\_\_  
Janis Dingman

## SERVICE LIST VIA CERTIFIED MAIL

Marhaba International Inc.  
KALUSTYAN'S, Agent for  
Marhaba International Inc.  
123 Lexington Ave  
New York, NY, 10016

Marhaba International Inc.  
c/o SAYEDUL ALAM, CEO  
123 Lexington Ave  
New York, NY, 10016

Marhaba International, Inc.  
c/o NY Department of State  
1 Commerce Plaza  
Albany, NY 12231

Kalustyan Corporation  
FERNANDO PORRAS, Agent for Service  
855 Rahway Avenue  
Union, NJ 07083

## PROOF OF SERVICE BY U.S. MAIL

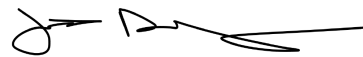
I declare that I am a citizen of the United States and a resident of the County of Placer. I am over the age of eighteen (18) and not a party to the within action. My business address is P.O. Box 740, Penryn, CA 95663.

- On May 22, 2024, I caused the following documents to be served, 60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act; Certificate of Merit, as indicated below:

SEE ATTACHED SERVICE LIST

- BY MAIL – by placing a true and correct copy of the original thereof enclosed in a sealed envelope with postage thereon fully prepaid in the firm’s outgoing mail. I am “readily familiar” with the firm’s practice of collecting and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business.
- BY HAND DELIVERY – by delivering by hand and leaving a true copy addressed to the person at the address shown above.
- BY EMAIL – by causing a true copy thereof to be electronically transmitted to the parties, by using their email address as indicated above.
- STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 22, 2024, at Penryn, California



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Janis Dingman

**Public Agency Service List (U.S. Mail)**

District Attorney,  
ALAMEDA COUNTY  
1225 Fallon St.  
Oakland, CA 94612

District Attorney,  
ALPINE COUNTY  
P.O. Box 248  
Markleeville, CA 96120

District Attorney,  
AMADOR COUNTY  
708 Court Street, #202  
Jackson, CA 95642

District Attorney,  
BUTTE COUNTY  
25 County Center Drive  
Administration Building  
Oroville, CA 95965

District Attorney,  
CALAVERAS COUNTY  
891 Mountain Ranch Road  
San Andreas, CA 95249

District Attorney,  
CONTRA COSTA COUNTY  
900 Ward Street  
Martinez, CA 94553

District Attorney, COLUSA  
COUNTY  
346 5th Street, Suite 101  
Colusa, CA 95932

District Attorney,  
DEL NORTE COUNTY  
450 H Street, Room 171 Crescent  
City, CA 95531

District Attorney,  
EL DORADO COUNTY  
778 Pacific Street  
Placerville, CA 95667

District Attorney, FRESNO  
COUNTY  
2220 Tulare Street, Suite 1000  
Fresno, CA 93721

District Attorney,  
GLENN COUNTY  
P.O. Box 430  
Willows, CA 95988

District Attorney,  
HUMBOLDT COUNTY  
825 5th Street  
Eureka, CA 95501

District Attorney,  
IMPERIAL COUNTY  
940 West Main Street,  
Suite 102  
El Centro, CA 92243

District Attorney,  
INYO COUNTY  
P.O. Drawer D  
Independence, CA 93526

District Attorney,  
KERN COUNTY  
1215 Truxtun Avenue  
Bakersfield, CA 93301

District Attorney,  
KINGS COUNTY  
1400 West Lacey Blvd.  
Hanford, CA 93230

District Attorney,  
LAKE COUNTY  
255 N. Forbes Street  
Lakeport, CA 95453

District Attorney,  
LASSEN COUNTY  
2950 Riverside Drive, #102  
Susanville, CA 96130

District Attorney,  
LOS ANGELES COUNTY  
211 W. Temple Street  
Suite 1200  
Los Angeles, CA 90012

District Attorney,  
MADERA COUNTY  
209 West Yosemite Avenue  
Madera, CA 93637

District Attorney,  
MARIN COUNTY  
3501 Civic Center Drive  
Room 130  
San Rafael, CA 94903

District Attorney,  
MARIPOSA COUNTY  
P.O. Box 730  
Mariposa, CA 95338

District Attorney,  
MENDOCINO COUNTY  
P.O. Box 1000  
Ukiah, CA 95482

District Attorney,  
MERCED COUNTY  
550 West Main Street  
Merced, CA 95340

District Attorney  
MODOC COUNTY  
204 S. Court Street,  
Room 202  
Alturas, CA 96101

District Attorney,  
MONO COUNTY  
P.O. Box 2053  
Mammoth Lakes, CA 93546

District Attorney,  
MONTEREY COUNTY  
142 W. Alisal Street  
Suite A  
Salinas, California 93901

District Attorney,  
NAPA COUNTY  
1195 Third Street  
Napa, CA 94559

District Attorney,  
NEVADA COUNTY  
201 Commercial Street  
Nevada City, CA 95959

District Attorney,  
ORANGE COUNTY  
300 North Flower St.  
Santa Ana, CA 92703

District Attorney,  
PLACER COUNTY  
10810 Justice Center Drive  
Roseville, CA 95678

District Attorney,  
PLUMAS COUNTY  
520 Main Street,  
Room 404  
Quincy, CA 95971

District Attorney,  
RIVERSIDE COUNTY  
3960 Orange Street  
Riverside, CA 92501

District Attorney,  
SACRAMENTO COUNTY  
901 G Street  
Sacramento, CA 95814

District Attorney,  
SAN BENITO COUNTY  
419 4th Street  
Hollister, CA 95023

District Attorney,  
SAN BERNARDINO COUNTY  
303 W. 3<sup>rd</sup> Street  
San Bernardino, CA 92415

District Attorney,  
SAN DIEGO COUNTY  
330 W. Broadway  
San Diego, CA 92101

District Attorney,  
SAN FRANCISCO COUNTY  
350 Rhode Island Street  
North Building, Suite 400N  
San Francisco, CA 94103

District Attorney,  
SAN JOAQUIN COUNTY  
P O Box 990  
Stockton, CA 95201

District Attorney,  
SAN LUIS OBISPO  
1055 Monterey Street  
San Luis Obispo, CA 93408

District Attorney,  
SAN MATEO COUNTY  
400 County Center,  
Third Floor  
Redwood City, CA 94063

District Attorney,  
SANTA BARBARA COUNTY  
1112 Santa Barbara Street  
Santa Barbara, CA. 93101

District Attorney,  
SANTA CLARA COUNTY  
70 West Hedding Street  
San Jose, CA 95110

District Attorney,  
SANTA CRUZ COUNTY  
701 Ocean Street  
Rm. 200  
Santa Cruz, CA 95060

District Attorney,  
SHASTA COUNTY  
1355 West Street  
Redding, CA 96001

District Attorney,  
SIERRA COUNTY  
100 Courthouse Square  
Downieville, CA 95936

District Attorney,  
SISKIYOU COUNTY  
P.O. Box 986  
Yreka, CA 96097

District Attorney,  
SOLANO COUNTY  
675 Texas Street, Suite 4500  
Fairfield, CA 94533

District Attorney,  
SONOMA COUNTY  
600 Administration Drive  
Room 212 J  
Santa Rosa, CA 95403

District Attorney,  
STANISLAUS COUNTY  
832 12th Street, Suite 300  
Modesto, CA 95353

District Attorney,  
SUTTER COUNTY  
463 2nd Street  
Suite 102  
Yuba City, CA 95991

District Attorney,  
TEHAMA COUNTY  
P.O. Box 519  
Red Bluff, CA 96080

District Attorney,  
TRINITY COUNTY  
P.O. Box 310  
Weaverville, CA 96093

District Attorney,  
TULARE COUNTY  
221 S. Mooney Blvd  
Room 224  
Visalia, CA 93291

District Attorney,  
TUOLUMNE COUNTY  
423 N. Washington Street  
Sonora, CA 95370

District Attorney,  
VENTURA COUNTY  
800 S. Victoria Avenue  
Suite 314  
Ventura, CA 93009

District Attorney,  
YOLO COUNTY  
301 Second Street  
Woodland, CA 95695

District Attorney,  
YUBA COUNTY  
215 Fifth Street, Suite 152  
Marysville, CA 95901

Los Angeles City Attorney  
200 N. Main St  
Suite 1800  
Los Angeles, CA 90012

Sacramento City Attorney  
915 I Street  
Sacramento, CA 95814

San Diego City Attorney  
1200 Third Ave.  
#1620  
San Diego, CA 92101

San Francisco City Attorney  
City Hall, Room 234  
1 Dr. Carlton B. Doodlett Pl.  
San Francisco, CA 94102

San Jose City Attorney  
200 E. Santa Clara St.  
16th Floor  
San Jose, CA 95113



**Proof of Service via Electronic Upload**

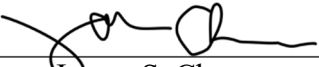
I declare that I am a citizen of the United States and a resident of the County of San Diego. I am over the age of eighteen (18) and not a party to the within action. My business address is 4079 Governor Dr., No. 1018, San Diego, CA, 92122.

On May 22, 2024, I caused the following documents to be electronically served upon the Office of the Attorney General, State of California, via upload to the Office of the Attorney General's website at the <https://oag.ca.gov/prop65/add-60-day-notice> web address:

- 60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act; and
- Certificate of Merit, with confidential attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 22, 2024, at San Diego, California.

  
\_\_\_\_\_  
Jarrett S. Charo