# GOLDEN STATE CONSUMER LAW GROUP PROFESSIONAL CORPORATION

20301 SW Acacia Street, Ste 250, Newport Beach, CA 92660 TEL 949.777.9897 FAX 949.777.9448

www.AlvandiGroup.com

February 14, 2025

# SIXTY-DAY NOTICE OF INTENT TO SUE FOR VIOLATION OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986

(Cal. Health & Safety Code § 25249.5, et seq.) ("Proposition 65")

Re: Violations of Proposition 65 related to Mercury, Lead, Antimony Trioxide, and Cadmium

TO: Office of the California Attorney General

Prop 65 Enforcement Reporting. Via upload to the Office of the Attorney General's website at the following web address: <a href="https://oag.ca.gov/prop65/add-60-day-notice">https://oag.ca.gov/prop65/add-60-day-notice</a>

Alleged Violator(s): Forum Brands, LLC Brenton James Howland, CEO

**FROM:** Golden State Consumer Law Group, Inc

Dear Alleged Violator(s) and Public Enforcement Agencies:

This office, Golden State Consumer Law Group, Inc., an organization in the State of California acting in the interest of the general public, (hereinafter "GSCLG" or "Claimant"), serves this Notice of Violation ("Notice") on Forum Brands, LLC (collectively "Violator(s)") pursuant to California Health & Safety Code section 25249.7(d) and in compliance with Proposition 65 and identifies Gil Alvandi as the responsible individual to contact in response to this Notice. The violations alleged by this Notice consist of exposures to the following toxic chemicals in Forum Brands, LLC product: Antimony Trioxide, Mercury, Lead, and Cadmium. These chemicals are known to the state of California to cause cancer and reproductive harm and are listed as carcinogens and reproductive toxicants under Proposition 65. This Notice satisfies a prerequisite for Claimant to commence an action against Violators in any Superior Court of California to enforce Proposition 65.

#### I. INTRODUCTION:

This Notice is provided to the public agencies listed above and in the attached proof of service pursuant to California Health & Safety Code § 25249.6, et seq. ("Proposition 65"). As noted above, notice is also being provided to the violator(s). The violations covered by this Notice consists of a summary of Proposition 65, Statement of Violation, Number and Duration of Violation, Product Category/Type, Listed Chemical(s), Preservation of Evidence, Product Exposure, Routes of Exposure and type of harm resulting from exposure to the chemicals including but not limited to (the "Chemical(s)") as follows:

#### A. Antimony Trioxide

Chemical Status: Cancer

Safe Harbor Level: None established for the route of exposure (dermal)

As of January 1, 2024, the No Significant Risk Level (NSRL) for inhalation exposure to **Antimony Trioxide** is set at 0.13 micrograms per cubic meter. However, no safe harbor level has been established for dermal exposure (the exposure route relevant to Forum Brands, LLC product, Tampons). Without a safe harbor level for dermal exposure, Forum Brands, LLC product may expose consumers to a significant risk of cancer, requiring a Proposition 65 warning unless the exposure can be shown to be below the significant risk threshold.

In the absence of a safe harbor level for dermal exposure, businesses are required to provide a Proposition 65 warning unless they can demonstrate through reliable evidence that the exposure does not pose a significant risk of cancer. Walmart Inc. product should bear a Proposition 65 warning unless a sufficient demonstration is made.

#### **B.** Mercury

Chemical Status: Cancer

**Safe Harbor Level**: None established for the route of exposure (dermal)

Mercury is listed as a chemical known to the state of California to cause cancer. There is no safe harbor level established for Mercury with dermal exposure, as the safe harbor levels apply to oral and inhalation routes. Businesses that expose individuals to Mercury are required to provide a Proposition 65 warning unless they can show that the exposure level does not pose a significant risk of cancer. In this case, a warning is required due to the absence of an established safe harbor level for this exposure route.

#### C. Lead

Chemical Status: Cancer

**Safe Harbor Level**: 15 µg/day (oral exposure)

Lead is listed as a carcinogen under Proposition 65, and although a safe harbor level for oral exposure is set at 15 micrograms per day, no safe harbor level has been established for dermal exposure (the relevant route for Forum Brands, LLC product). Since the exposure route in the product is dermal, and there is no established safe harbor level for dermal exposure to Lead, businesses are required to provide a Proposition 65 warning unless they can demonstrate through reliable evidence that the exposure does not pose a significant risk of cancer. Your product should bear a Proposition 65 warning unless a sufficient demonstration is made.

#### D. Cadmium

Chemical Status: Reproductive Toxicity Safe Harbor Level: 4.1 µg/day (oral exposure)

Cadmium is listed for reproductive toxicity under Proposition 65, with a Maximum Allowable Dose Level (MADL) for oral exposure of 4.1 micrograms per day. Although no safe harbor level has been established for dermal exposure to **Cadmium**, the route of exposure through the subject product is dermal. In the absence of a safe harbor level for dermal exposure, businesses are required to provide a Proposition 65 warning unless they can demonstrate through reliable evidence that the exposure does not pose a significant risk for reproductive harm. If the exposure through your product exceeds safe levels, a Proposition 65 warning is required.

In the absence of safe harbor levels for **dermal exposure**, businesses are required to provide a **Proposition 65 warning** unless they can demonstrate through reliable evidence that the exposure does **not pose a significant risk** of cancer or reproductive harm. Our testing indicates that the levels of these chemicals in the subject product may exceed the threshold for significant risk, and therefore, Forum Brands, LLC product should bear **Proposition 65 warning.** 

Under California law, businesses that expose individuals to listed chemicals are required to provide clear and reasonable warnings to consumers prior to exposure. Failure to do so may result in enforcement action. This **Notice of Violation** is being issued to inform you of this potential violation.

Please note that under **Proposition 65**, the responsible party has **60 days** from the date of this notice to either correct the violation by providing a warning or to **demonstrate that the exposure level does not exceed the safe threshold**. If the violation is not addressed within this period, further legal action may be pursued.

# II. PROPOSITION 65 INFORMATION – SUMMARY:

A summary of Proposition 65 and its implementation regulations, prepared by the Office of Environmental Health Hazard Assessment, the lead agency designated under Proposition 65, is enclosed with the copy of the Notice served on the Notice Recipients. For more 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.

# III. STATEMENT OF VIOLATIONS:

The alleged violators knowingly and intentionally also have exposed and continued to knowingly expose consumers within the State of California to the listed chemicals at levels that, upon reasonable use of the product, exceed the maximum allowable dose level without providing clear and reasonable warning of that exposure. More specifically, Violator(s) does/do not warn that the product(s) contain a chemical known to the State of California to cause cancer/reproductive toxicity.

Proposition 65 requires that a "clear and reasonable" warning be provided prior to exposure to certain listed chemicals. Violator(s) are in violation of Proposition 65 because the Violators have failed to provide a warning to consumers that they are being exposed to Chemicals. While in the course of doing business, the Violators are "knowingly and intentionally" exposing consumers to Chemicals without first providing a "clear and reasonable" warning. See *Cal. Health and Safety Code §* 25249.6.

The Violator has manufactured, marketed, distributed, and/or sold the listed product, which has exposed and continues to expose numerous individuals within California to the identified chemical(s). Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to these chemical(s). The method of warning should be a warning that appears on the product's packaging. Violator(s) violated Proposition 65 because it failed to provide an appropriate warning to persons using these products that they are being exposed to these chemicals.

Without such 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 Chemical(s) while properly using the product(s). Claimant is an entity in the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals 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.

#### IV. TYPE OF PRODUCT AND ROUTE OF EXPOSURE

**E.** The product causing exposure without a warning in violation of Proposition 65 is the Lola Organic Cotton Tampon. The product is designed to be used by females when menstruating. Use of the product identified in this notice results in human exposures to the listed chemical(s). The exposure route for the chemicals in Forum Brands, LLC product is dermal, as the product is designed for direct contact with the skin. While some chemicals listed under Proposition 65, such as Antimony Trioxide Cadmium, and lead, have established safe harbor levels for specific exposure routes (such as inhalation or ingestion), **no such levels have been established for dermal exposure.** Therefore, in the absence of a safe harbor level for dermal exposure, businesses are required to provide a Proposition 65 warning unless they can demonstrate through reliable evidence that the exposure does not pose a significant risk of cancer or reproductive harm. Consequently, Forum Brands, LLC must either provide Proposition 65 warning or demonstrate that the exposure levels are below the threshold for significant risk.

# V. NUMBER AND DURATION OF VIOLATIONS

With respect to the product(s) specified above, the violations commenced on the latter of the date that the specified product(s) were first offered for sale in California or the date upon which California law codified the allowable level of the relevant chemical(s) surpassed by the specified product(s); have continued every day since the relevant date the violations started; and will continue every day until the listed chemicals are removed from the specified product(s), reduced to allowable levels, or until a "clear and reasonable" warning is provided to consumers by the noticed parties

in accordance with the law. Plaintiff believes that the violations are currently occurring and ongoing and, on information and belief, believes that the Violations have been occurring since at least 07/01/2021.

#### VI. EVIDENCE PRESERVATION REQUEST TO ALLEGED VIOLATOR(S):

Alleged Violator(s) are hereby requested to preserve any and all evidence relating to the violations described herein. This includes, without limitation, preserving any warning materials concerning exposure to the Chemical(s) and all communications regarding any such exposures. This also includes, without limitation, documenting (through photography and/or video recording) the present existence, content, and location of all warning materials-including labels, signs, tags, and other language that the Violator(s) contend(s) provides consumers with the "clear and reasonable" warning required by Health & Safety Code section 25249.6 regarding the exposures (and preserving any historical depictions of such warning materials). The failure to preserve the requested evidence may result in sanctions and other penalties.

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

Pursuant to *Health & Safety Code* §25249.6 and Title 11, California Code of Regulations, section 3100, a Certificate of Merit is attached hereto. A second copy of the entire notice and Certificate of Merit is served on the Attorney General with all supporting documentation required by section 3102 attached.

## VIII. RESOLUTION OF NOTICED CLAIMS

Consistent with the goals of Proposition 65 and a desire to have these violations corrected, ALG is interested in seeking a resolution of this matter. Such a resolution will prevent further unwarned consumer exposure to the Chemical(s), as well as expensive and time-consuming litigation.

Based on the allegations set forth in this Notice, Golden State Consumer Law Group, Inc. intends to file a citizen enforcement lawsuit against violator(s) unless it agrees in a binding written agreement to: (1) recall products already sold or otherwise provided to consumers; (2) provide clear and reasonable warnings for products sold or otherwise provided to consumers in the future to eliminate unknowing exposures or reformulate such products to eliminate Listed Chemicals exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249.7(b). If Violator(s) is/are interested in resolving this dispute without resorting to expensive and time-consuming litigation, please feel free to contact Nooshin Didarmorshedi, who is the responsible individual for Claimant, directly on behalf of Golden State Consumer Law Group, Inc.

It should be noted that counsel cannot (1) finalize any settlement until after the 60-day notice period has expired; or (2) speak for the California Attorney General or any District or City Attorney who has received this notice. Therefore, while reaching an agreement with ALG will resolve its claims; such an agreement may not satisfy the public prosecutors.

Proposition 65 requires that notice of intent to sue be given to Violator(s) sixty (60) days before the suit is filed. *Cal. Health & Safety Code* § 25249.7(d)(1). With this letter, Claimant gives notice of the alleged violations to Violator(s) and the appropriate governmental authorities. In absence of any action by the appropriate governmental authorities within sixty (60) calendar days of the date of sending this notice (plus ten (10) calendar days because the place of address is beyond the State of California but within the United States), Claimant may file suit. See *Cal. Code Civ. Proc.* §1013; *Cal. Health & Safety Code* § 25249.7(d)(1); and *Cal. Code Regs.* tit. 27 § 25903(d)(1). Claimant remains open and willing to discuss the possibility of resolving the grievances short of formal litigation.

All communications regarding this notice may be made to Gil Alvandi, the above-listed firm contact, at the address, telephone number, or via email to <a href="mailton@alvandigroup.com">bhamilton@alvandigroup.com</a>.

# **Attachments:**

Certificate of Merit

Supporting Documentation for Certificate of Merit (to Attorney General Only)

Proposition 65: A Summary

#### **CERTIFICATE OF MERIT**

Health and Safety Code Section 25249.7(d)

# I, Gil Alvandi, Esq., hereby declare:

02/14/25

- 1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the parties identified in the notice have violated Health and Safety Code § 25249.6 by failing to provide clear and reasonable warnings.
- 2. I am the attorney for the noticing party.
- 3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the Listed Chemical that is the subject of this 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 plaintiff's case can be established and the information did not prove that the alleged Violators will be able to establish any of the affirmative defenses set forth in the statute; and
- 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 information identified in Health and Safety Code § 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:	,	
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		VS
		Gil Alvandi, Esq.

# CERTIFICATE OF SERVICE PURSUANT TO 27 CCR § 25903

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am over the age of 18 and not a party to this case. I am a resident of or employed in the county where the mailing occurred. I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. My business address is 20301 SW Acacia Street, Second Floor, Newport Beach, CA 92660.

# ON THE DATE SHOWN BELOW, I SERVED THE FOLLOWING DOCUMENTS:

- 60-Day Notice of Violation of Health & Safety Code § 25249.5, ET SEQ.
- The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary
- Certificate of Merit pursuant to Health & Safety Code § 25249.7(d)

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties listed below, and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Name & Address	
Brenton James Howland, CEO	22 W 18 <sup>th</sup> St., FL 5 New York, NY 10011

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties listed below, and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by USPS mail:

Name:	Address:
See attached list of mailed notices	

on the following parties via electronic service:

Name:					Address:
See	attached	list	of	electronic	
recipients					

Executed on February 14, 2025, in Newport Beach, California.

Blair M. Hamilton

Blair M. Hamilton

Senior Paralegal

# **Proof of Service via Electronic Upload**

I declare that I am a citizen of the United States and a resident of the County of Orange. I am over the age of eighteen (18) and not a party to the within action. My business address is 20301 SW Acacia Street, Second Floor, Newport Beach, CA 92660.

On the date shown below, 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 following web address: <a href="https://oag.ca.gov/prop65/add-60-day-notice">https://oag.ca.gov/prop65/add-60-day-notice</a>:

Office of the California Attorney General Prop 65 Enforcement Reporting 1515 Clay Street, Suite 2000 Oakland, CA 94612-0550

- 60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act;
- Certificate of Merit, with confidential attachment;
- The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary; and

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

Executed on February 14, 2025, at Newport Beach, California.

Blair M. Hamilton Senior Paralegal

Blair M. Hamilton

# APPENDIX A OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENTCALIFORNIA 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 statuteand 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 ONTHE NOTICE.

The text of Proposition 65 (Health and Safety Code Sections 25249.5 through 25249.13) is available online at: <a href="http://oehha.ca.gov/prop65/law/P65law72003.html">http://oehha.ca.gov/prop65/law/P65law72003.html</a>. 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. These implementing regulations are available online at: <a href="http://oehha.ca.gov/prop65/law/P65Regs.html">http://oehha.ca.gov/prop65/law/P65Regs.html</a>.

#### WHAT DOES PROPOSITION 65 REQUIRE?

**The "Proposition 65 List."** Under Proposition 65, the lead agency (OEHHA) publishesa 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 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 onthe OEHHA website at: 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 listedchemicals 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 thatthe 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

<sup>&</sup>lt;sup>1</sup> All further regulatory references are to sections of Title 27 of the California Code of Regulations unlessotherwise indicated. The statute, regulations and relevant case law are available on the OEHHA website at: http://www.oehha.ca.gov/prop65/law/index.html.

(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 afterthe chemical has been listed. The Proposition 65 discharge prohibition does not applyto 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, stateor 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-yearlifetime. 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: <a href="http://www.oehha.ca.gov/prop65/getNSRLs.html">http://www.oehha.ca.gov/prop65/getNSRLs.html</a> 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. Inother 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: <a href="http://www.oehha.ca.gov/prop65/getNSRLs.html">http://www.oehha.ca.gov/prop65/getNSRLs.html</a> for a list of MADLs, and Section 25801 et seq. of the regulations for information concerninghow 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 canbe 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 thatamount 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. 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.

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

# Documents served via USPS 1st class mail to:

served via USPS 1st class mail	T	1
District Attorney	District Attorney	District Attorney
Alpine County	Lake County	Sierra County
PO Box 248	255 North Forbes Street	PO Box 457
Markleeville, CA 96120	Lakeport, CA 95453	Downieville, CA 95936
District Attorney	District Attorney	District Attorney's Office
Amador County	Los Angeles County	Siskiyou County Courthouse
708 Court Street, Suite 202	Hall of Justic 211 West	311 Fourth Street, Room 204
Jackson, CA 95642	Temple St. Ste 1200	Yreka, CA 96097
	Los Angeles, CA 90012	
Butte County DA	Madera County	Solano County
25 County Center Dr.	209 West Yosemite Avenue	675 Texas Street, Ste 4500
Suite 245	Madera, CA 93637	Fairfield, CA 94533
Oroville, CA 95965		
District Attorney	District Attorney	District Attorney
Colusa County	Mono County	Stanislaus County
310 6 <sup>th</sup> Street	Post Office Box 617	832 12th Street, Ste 300
Colusa, CA 95932	Bridgeport, CA 93517	Modesto, CA 95354
		,
District Attorney	District Attorney	District Attorney
Del Norte County	Mendocino County	Sutter County
450 H Street, Suite 171	PO Box 1000	446 Second Street
Crescent City, CA 95531	Ukiah, CA 95482	Yuba City, CA 95991
District Attorney	District Attorney	District Attorney
Trinity County	Modoc County	Tehama County
Post Office Box 310	204 S Court St, Rm 202	PO Box 519
Weaverville, CA 96093	Alturas, CA 96101-4020	Red Bluff, CA 96080
District Attorney	District Attorney	District Attorney
Glenn County	San Benito County	Tuolumne County
Post Office Box 430	419 4 <sup>th</sup> Street	423 North Washington St.
Willows, CA 95988	Hollister, CA 95023	Sonora, CA 95370
District Attorney	District Attorney	District Attorney
Humboldt County	San Bernardino County	Yuba County
825 5th Street 4 <sup>th</sup> Floor	303 West 3 <sup>rd</sup> Street	215 Fifth Street, Suite 152
	San Bernardino, CA 92415	Marysville, CA 95901
Eureka, CA 95501	San Demardino, CA 92413	Ivialysville, CA 93901
District Attorney	District Attorney	LA City Attorney
Imperial County	San Mateo County	City Hall East
940 W Main St, Ste 102	400 County Ctr., 3rd Floor	200 N. Main St., Ste 800
El Centro, CA 92243	Redwood City, CA 94063	· ·
·	• •	Los Angeles, CA 90012
District Attorney	District Attorney	San Jose City Attorney
Kern County	Shasta County	200 East Santa Clara St, 16 <sup>th</sup>
1215 Truxtun Avenue	1355 West Street	San Jose, CA 95113
Bakersfield, CA 93301	Redding, CA 96001	
District the second		
District Attorney		
Kings County		
1400 West Lacey Blvd.		
Hanford, CA 93230		

# Documents served via electronic mail to:

s served via electronic man to:	
Alameda County District Attorney	Calaveras County District Attorney
CEPDProp65@acgov.org	Prop65Env@co.calaveras.ca.us
Contra Costa County District Attorney	Inyo County District Attorney
sgrassini@contracostada.org	inyoda@inyocounty.us
Lassen County Distlict Attorney	Mariposa County District Attorney
dchandler@co.lassen.ca.us	mcda@mariposacounty.org
Merced County District Attorney	Monterey County District Attorney
Prop65@countyofmerced.com	Prop65DA@co.monterey.ca.us
Napa County District Attorney	Nevada County District Attorney
CEPD@countyofnapa.org	DA.Prop65@co.nevada.ca.us
Placer County District Attorney	Plumas County District Attorney
Prop65@Placer.ca.gov	davidhollister@countyofPlumas.com
Riverside County District Attorney	Sacramento County District Attorney
Prop65@rivcoda.org	Prop65@sacda.org
San Diego City Attorney	San Diego County District Attorney
CityAttyProp65@sandiego.gov	SanDiegoDAProp65@sdcda.org
San Francisco County District Attorney	San Francisco City Attorney
alexandra.grayner@sfgov.org	Prop65@sfcityatty.org
San Joaquin County District Attorney DA	San Luis Obispo County District Attorney
DAConsumer.Environmental@sjcda.org	edobroth@co.slo.ca.us
Santa Barbara County District Attorney	Santa Clara County District Attorney
DAProp65@co.santa-barbara.ca.us	EPU@da.sccgov.org
Santa Cruz County District Attorney	Sonoma County District Attorney
Prop65DA@santacruzcounty.us	jeannie.barnes@sonoma-
	county.org
Tulare County District Attorney	Ventura County District Attorney
Prop65@co.tulare.ca.us	daspecialops@ventura.org
Yolo County District Attorney	El Dorado County Assistant District Attorney
cfepd@yolocounty.org	EDCDAPROP65@edcda.us
Fresno County District Attorney	Marin County District Attorney
consumerprotection@fresnocountyca.gov	consumer@marincounty.gov
Orange County District Attorney	Santa Clara City Attorney
Prop65Notice@ocdapa.org	Proposition65notices@sanjoseca.gov