

NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act

UNLEADED GASOLINE (WHOLLY VAPORIZED) AT GASOLINE SERVICE STATIONS

July 29, 2026

This Notice of Violation (“Notice”) is provided to you pursuant to and in compliance with California Health and Safety Code § 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act (“Proposition 65”), see the attached summary provided by the Office of Environmental Health Hazard Assessment (copies of summary not provided to public enforcement agencies).
- This Notice is provided by Public Protection Alliance LLC, 2450 Colorado Ave, Suite 100E, Santa Monica, CA 90404. Public Protection Alliance is a California company acting in the interest of the general public seeking to further, among other causes, the protection of the environment, toxin reduction, the promotion and improvement of human health, the improvement of consumer rights, and corporate accountability. Public Protection Alliance designates its counsel, Emily Culbertson, as the responsible individual with regard to this Notice.

Description of Violation:

- Violators: The names and addresses of the violators are identified in the table below.
- Time Period of Exposure: The violations have been occurring since at least June 9, 2026, and are continuing to this day.
- Provision of Proposition 65: This Notice covers the warning provision of Proposition 65, which is found at California Health and Safety Code Section 25249.6.
- Chemical(s) Involved: The name of the listed chemical involved in these violations is unleaded gasoline (wholly vaporized).
- Source of Exposure: The specific source of the exposures causing the violation is the operation of gasoline service stations, including the dispensing, handling, and storage of gasoline and other petroleum products and the presence of motor vehicle exhaust. The service station location(s) at issue are listed in the table below.

- **Description of Exposure:** Ordinary presence at the service stations identified in this Notice results in human exposures to unleaded gasoline (wholly vaporized) because this chemical is present at such service stations. The routes of exposure for the violations are inhalation of the air in the area and skin contact with petroleum products. These exposures occur at gasoline service stations throughout California where consumers, customers, employees, and other members of the public are present.
- No clear and reasonable Proposition 65 warning is provided at these service stations regarding the exposures to unleaded gasoline (wholly vaporized). Pursuant to Title 27, California Code of Regulations, sections 25607.26 and 25607.27, a warning for these environmental exposures must be posted on a sign at each gasoline pump and must state, in substance: “WARNING: Breathing the air in this area or skin contact with petroleum products can expose you to chemicals including benzene, motor vehicle exhaust and carbon monoxide, which are known to the State of California to cause cancer and birth defects or other reproductive harm. Do not stay in this area longer than necessary. For more information go to www.P65Warnings.ca.gov/service-station.” The alleged violators have failed to provide this or any clear and reasonable warning.

Violators and Service Stations Subject to this Notice

Names and Addresses of Violators	Service Station Name(s) and Location(s)
Robert G Petersen Jr., CEO Buellflat Rock Company, Inc. 1214 Mission Drive Solvang, CA 93463	Buellflat Rock Gas Station 1214 Mission Drive Solvang, CA 93463

Resolution of Noticed Claims:

- Public Protection Alliance intends to file a citizen enforcement lawsuit against the alleged violators unless such violators agree in a binding written instrument to: (1) provide clear and reasonable Proposition 65 warnings for the exposures at the service station(s) identified in this Notice, in compliance with Title 27, California Code of Regulations, sections 25607.26 and 25607.27, including by posting the required warning on a sign at each gasoline pump; and (2) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code § 25249.7(b).
- Alleged violators should contact Public Protection Alliance through its counsel identified below to discuss resolution of this matter. It should be noted that Public Protection Alliance cannot (1) finalize any settlement until after the 60-day notice period has expired; nor (2) speak for the Attorney General or any District or City Attorney who received Public Protection Alliance’s 60-day Notice. Therefore, while

reaching an agreement with Public Protection Alliance will resolve its claims, such agreement may not satisfy the public prosecutors.

Preservation of Relevant Evidence:

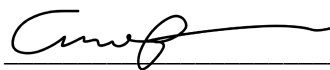
- This notice also serves as a demand that the alleged Violators preserve and maintain all relevant evidence, including all electronic documents and data, pending resolution of this matter. Such relevant evidence includes but is not limited to all documents related to the presence or potential presence of unleaded gasoline (wholly vaporized) at the service stations identified in this Notice; documents relating to the warnings, signage, or absence thereof posted at such service stations; ownership, operation, lease, and franchise information for such service stations; efforts to comply with Proposition 65 with respect to such service stations; air-monitoring or testing reports related to such service stations; communications with any person relating to Proposition 65 warnings at such service stations; and any photographs or representative exemplars of signage posted at such service stations in the year preceding this Notice through the date of any trial of the claims alleged in this Notice.

Request for Names and Contact Information

- The alleged violators are hereby requested to promptly provide the names and contact information for all persons and entities that own, operate, lease, franchise, or are otherwise responsible for the service stations identified in this Notice and for providing Proposition 65 warnings at such locations.

Please direct any inquiries regarding this Notice to Public Protection Alliance's counsel, Emily Culbertson, at Akempis P.C., 730 Arizona Ave, 2nd Floor, Santa Monica, CA 90401, (424) 433-4760, emilyculbertson@akempis.com.

AKEMPIS P.C.



Emily Culbertson
Attorney for Public Protection Alliance LLC

Enclosures:

Certificate of Merit

Certificate of Service

Appendix A ("The Safe Drinking Water and Toxic Enforcement Act of 1986
(Proposition 65): A Summary") (sent only to the Violators)

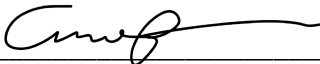
Factual information sufficient to establish the basis of the Certificate of Merit (sent only to Attorney General)

CERTIFICATE OF MERIT
Health & Safety Code § 25249.7(d)

I, Emily Culbertson, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney with Akempis P.C., and I represent the noticing party, Public Protection Alliance LLC.
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 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 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.
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.

July 29, 2026



Emily Culbertson
Attorney for Public Protection Alliance LLC

CERTIFICATE OF SERVICE

I, Jamie Decker, hereby declare under California law:

I am over the age of eighteen (18) years and not a party to this action. My business address is 730 Arizona Ave, 2nd Floor, Santa Monica, CA 90401 and my email address is jamie@akempis.com.

On July 29, 2026, I served the following documents on all interested parties in this action by placing a true copy thereof in the manner and at the addresses indicated below:

☒ BY CERTIFIED MAIL: I am readily familiar with the practice for collection and processing for correspondence for certified mailing by LetterStream, a printing and mailing company that sends certified mail via the U.S. Postal Service. I transmitted a PDF version of the documents noted below to LetterStream on July 29, 2026 for printing and mailing in the ordinary course of business to the names and addresses on the attached service list. The printed correspondence will be deposited by LetterStream in the mail with the U.S. Postal Service.

Please see attached service list for recipients sent by Certified Mail.

Contents mailed: 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.

☒ BY ELECTRONIC MAIL: I transmitted a PDF version of the documents noted below via email to the email address(es) indicated on the attached service list on the date executed.

Please see attached service list for recipients sent by Electronic Mail.

Contents emailed: NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT; CERTIFICATE OF MERIT.

☒ BY ELECTRONIC UPLOAD: I transmitted a PDF version of the documents noted below to the Office of Attorney General of California via the Proposition 65 File a 60-Day Notice website at <https://oag.ca.gov/prop65/add-60-day-notice> on the date executed.

Contents uploaded: NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT; CERTIFICATE OF MERIT; CONFIDENTIAL SUPPORTING EVIDENCE FOR CERTIFICATE OF MERIT.

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

Executed on July 29, 2026 at Oroville, California.

Jamie Decker

Jamie Decker

SERVICE LIST BY CERTIFIED MAIL:

Buellflat Rock Company, Inc.
c/o Registered Agent
Robert G Petersen Jr.
1214 Mission Drive
Solvang, CA 93463

SERVICE LIST BY ELECTRONIC MAIL:

Santa Barbara County DA
1112 Santa Barbara St.
Santa Barbara, CA 93101
DAProp65@co.santa-barbara.ca.us