



# Klamath

ENVIRONMENTAL  
LAW CENTER

September 22, 2011

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

Greetings:

This office and the Mateel Environmental Justice Foundation (“Mateel”) give you notice that the businesses listed on the attached Service List have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when people come into contact with the brass stanchions and attached chains used in crowd/line control at those locations that are listed on the attached sheet. Patrons at these locations are exposed to lead when they touch the above-referenced brass stanchions and chains while gathered near or while waiting in line at the these locations described in the attached sheet. The brass alloy used to make these stanchions and chains contains lead. When people touch these brass stanchions and chains, lead from the brass alloy comes off on their hands and is then absorbed through the skin, enters the body through cuts and abrasions, is ingested orally by being transferred from hands to food which is then eaten, or by hand-to-mouth (or other mucous membranes) behavior such as nail biting, or lead is transferred from hands to cigarettes and then inhaled when the cigarette is smoked. These lead exposures thus occur via the dermal absorption, subcutaneous, mucus membrane, ingestion and inhalation routes. These businesses did not and do not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since September 22, 2008, and will continue every day until the lead is removed from the alloys used to make stanchions and chains or until the listed businesses provide their patrons with Proposition 65-compliant warnings. The above-referenced violations are alleged for occupational exposures as well as for consumer service exposures. The actions that the listed companies' employees take that expose them to lead are the same as the actions taken by the listed companies' patrons—they touch the brass alloy from which the brass stanchions and chains are made. This Notice of Violation pertains only to Proposition 65 violations that occur in counties in which each listed site is located, namely, Alameda and Los Angeles Counties for the Elephant Bar locations, and Los Angeles County for the Universal Studios Globe Theater location.

Cordially

William Verick

## SERVICE LIST

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ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
POST OFFICE BOX 70550  
OAKLAND, CA 94612-0550

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

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF LOS ANGELES  
18000 CRIMINAL COURTS BUILDING  
210 W. TEMPLE ST.  
LOS ANGELES, CA 90012

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF ALAMEDA  
1225 FALLON STREET ROOM 900  
OAKLAND, CA 94612

JEFF ZUCKER, PRESIDENT  
NBC UNIVERSAL, INC.  
30 ROCKEFELLER PLZ  
NEW YORK NY 10112

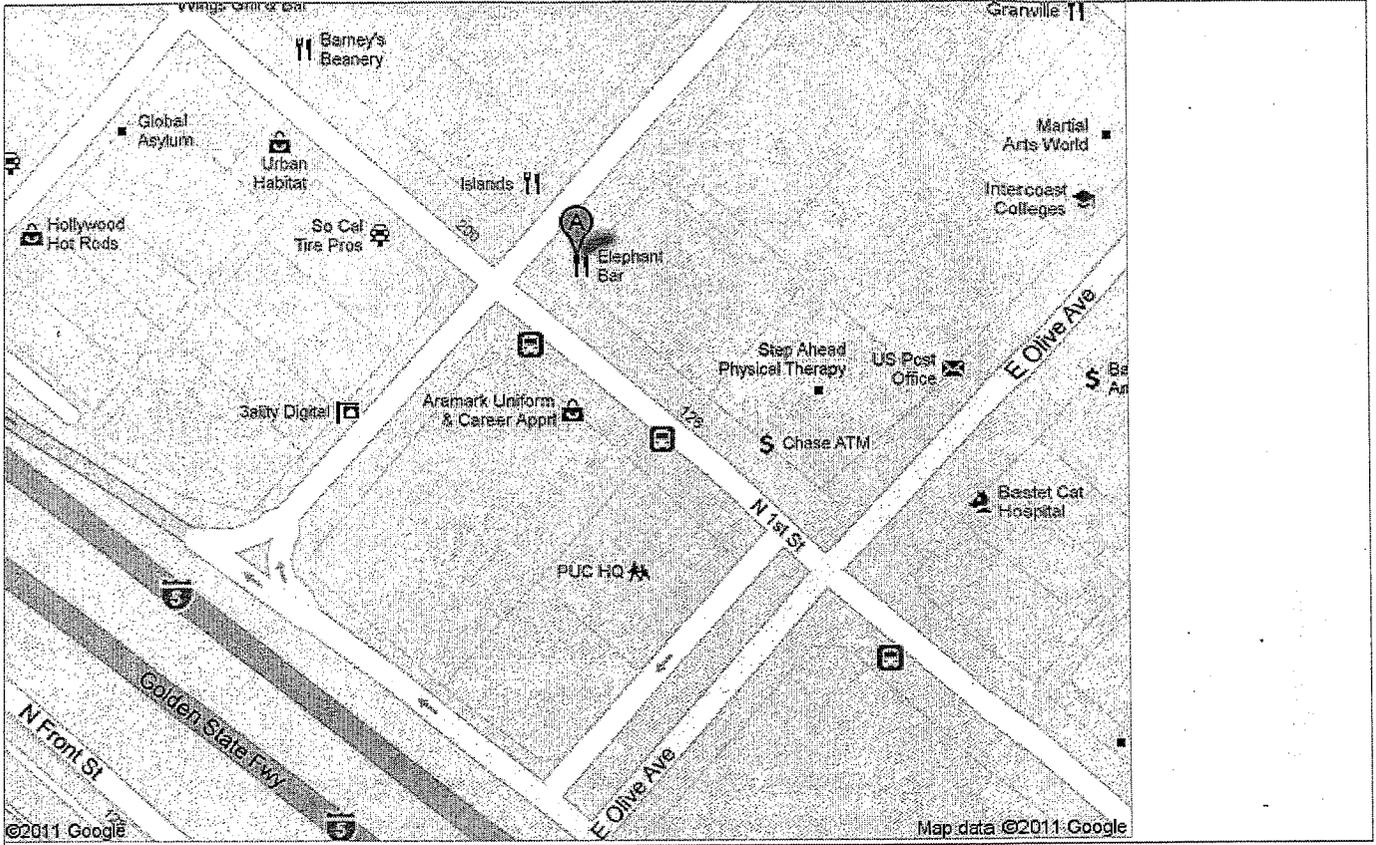
ROBERT HOLDEN, PRESIDENT & CEO  
S.B. RESTAURANT CO.  
14241 FIRESTONE BLVD., SUITE 315  
LA MIRADA, CA 90638

# Google maps **Elephant Bar Restaurant, North 1st Street, Burbank, CA**

**Get Google Maps on your phone**  
Text the word "GMAPS" to 466453



**A. Elephant Bar Restaurant**  
110 North 1st Street, Burbank, CA  
(818) 842-1334  
29 reviews

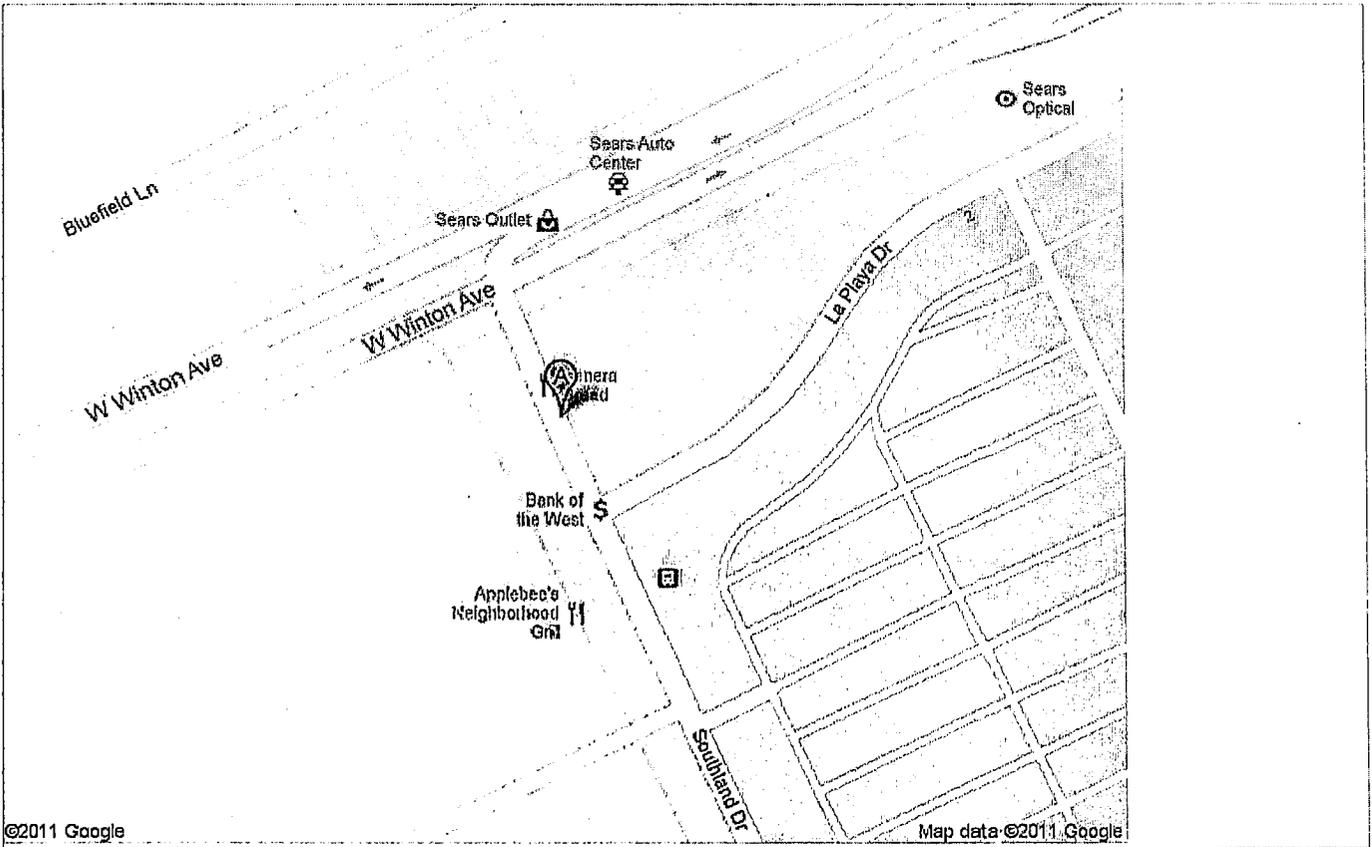


Google maps elephant bar near Hayward, Alameda, California

Get Google Maps on your phone  
 Text the word "GMAPS" to 466453



A. **Elephant Bar Restaurant**  
 24177 Southland Drive, Hayward, CA  
 (510) 266-0400  
 5 reviews

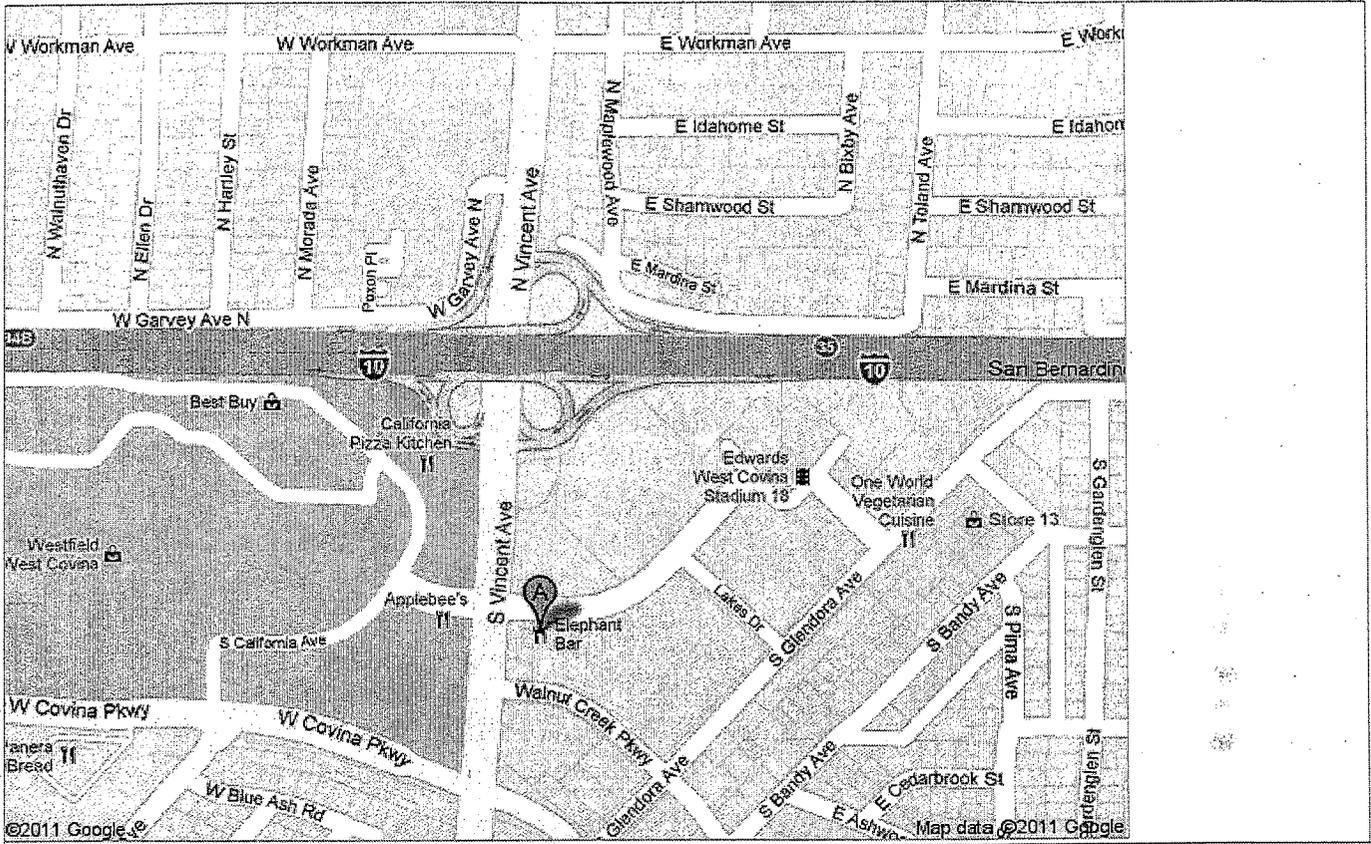


Google maps elephant bar near Covina, Los Angeles, California

Get Google Maps on your phone  
Text the word "GMAPS" to 466453

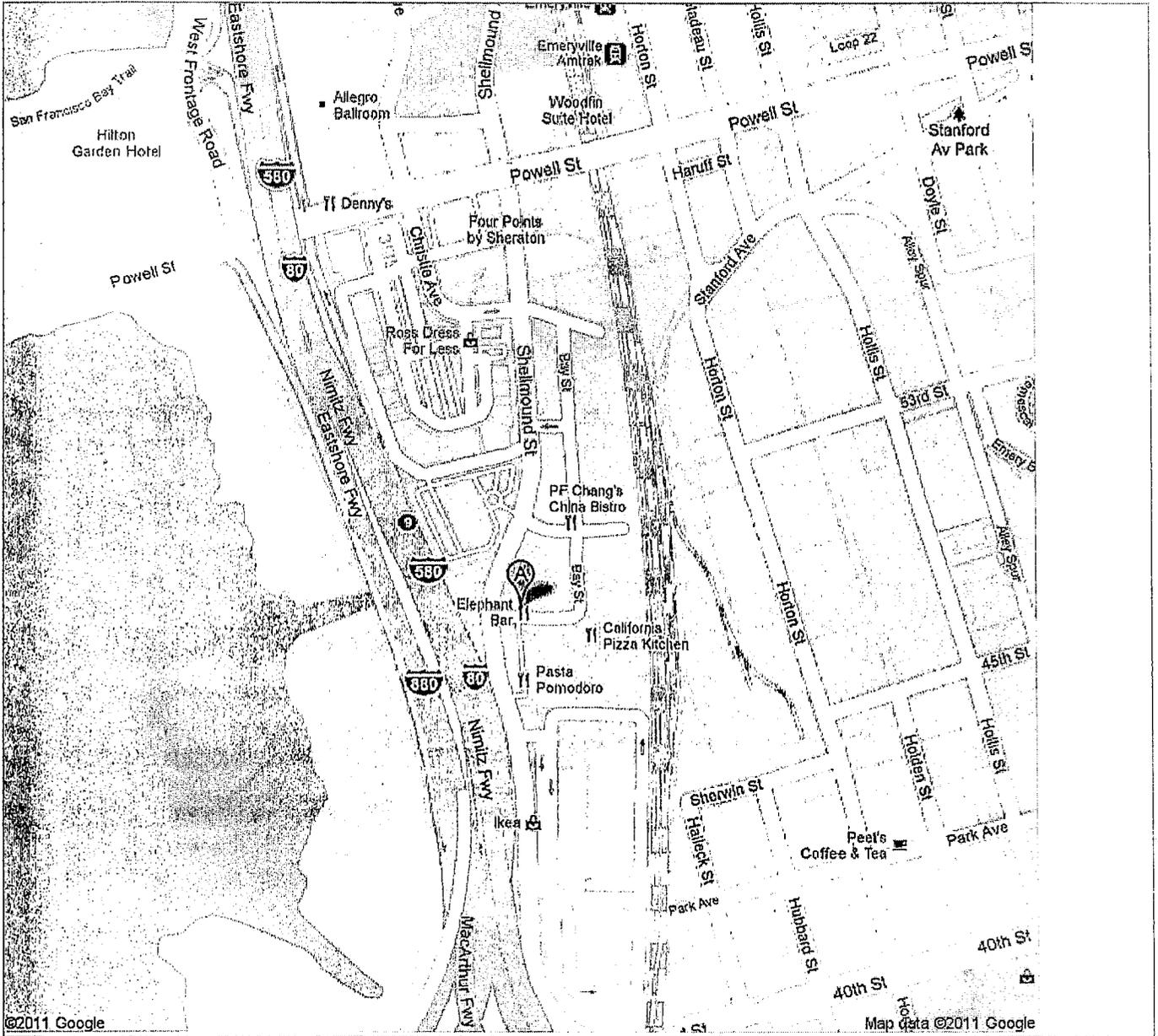


**A. Elephant Bar Restaurant**  
 200 S. Vincent Avenue, West Covina, CA  
 (626) 918-3400  
 8 reviews





Get Google Maps on your phone  
Text the word "GMAPS" to 466453



A. **Elephant Bar Restaurant**  
5601 Bay Street, Emeryville, CA  
(510) 601-1001  
35 reviews

THE OFFICIAL GUIDE

# LOS ANGELES

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## Event Venues / Television

### UNIVERSAL STUDIOS HOLLYWOOD GLOBE THEATRE

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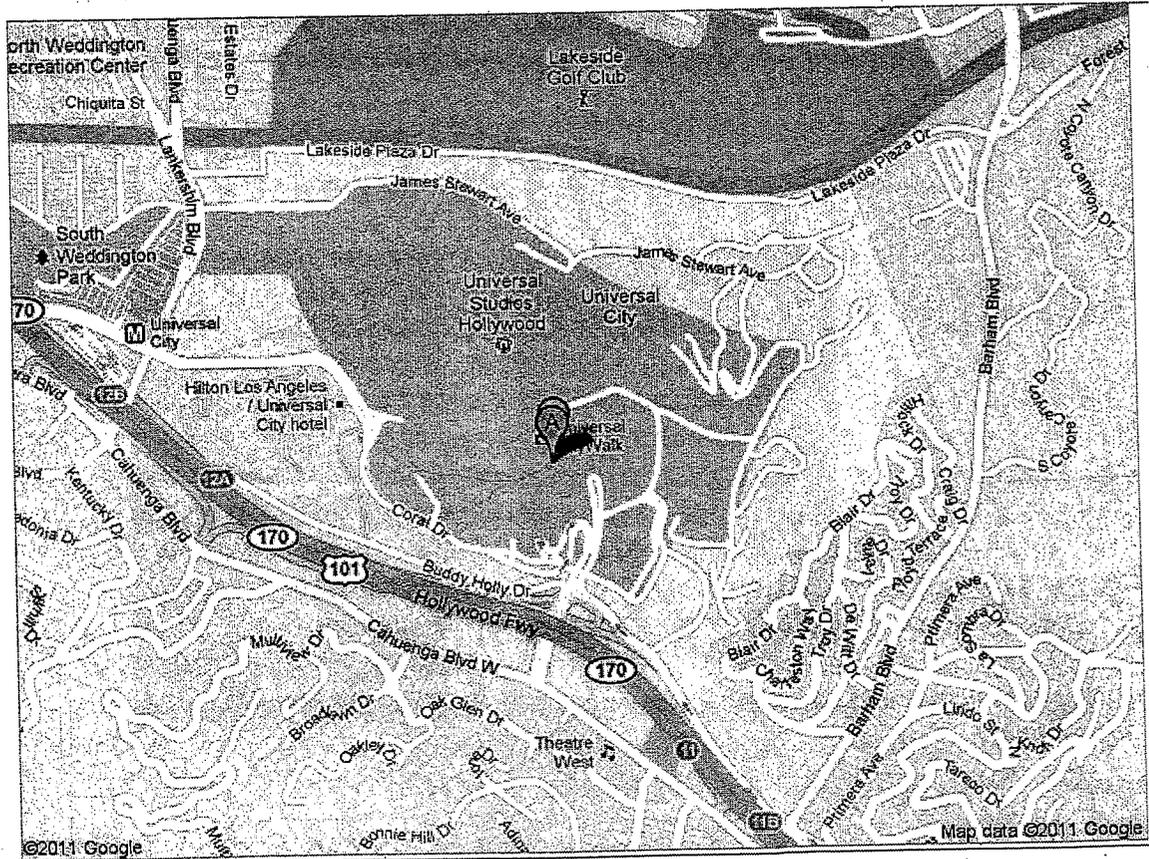
Search Website & More

100 Universal City Plaza  
Bldg. 5511-6  
Universal City, CA 91608  
Phone: 818.622.3215  
Fax: 818.622.0171  
www.universalhollywoodevents.com

arts & culture

meeting hotels

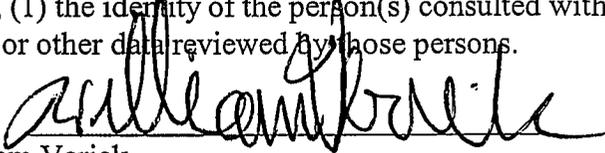
With 9,600 sq. ft. of space, state-of-the-art AV and lighting systems, an experienced technical staff, décor packages for any theme you like, and scrumptious catered cuisine from the chef to the stars – Wolfgang Puck Catering, The Globe Theatre can turn any affair into a red carpet extravaganza.



## CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: September 22, 2011

  
William Verick

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This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

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## CERTIFICATE OF SERVICE

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On September 22, 2011, I caused the attached NOTICE OF VIOLATION LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached NOTICE OF VIOLATION and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on September 22, 2011, at Eureka, California.

  
Nicole Frank