



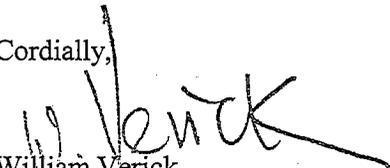
November 2, 2011

PROPOSITION 65 ENFORCEMENT REPORTING  
ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
P.O. 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 used in crowd/line control and brass hand rails on trolleys at the locations that are listed on the attached sheet. Patrons at these locations are exposed to lead when they touch the above-referenced brass stanchions while gathered near or while waiting in line or when riding the trolley cars at the locations described on the attached sheet. The brass or other metal alloy used to make these stanchions and hand rails contains lead. When people touch these brass stanchions and hand rails, lead from the brass or other metal 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, mucous membrane, ingestion and inhalation routes. The listed companies did not and do not provide people with clear and reasonable warnings before they expose people to lead. These violations have occurred every day since November 2, 2008, and will continue every day until the lead is removed from the alloys used to make stanchions and hand rails or until the listed companies 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 hand rails are made. This Notice of Violation pertains only to Proposition 65 violations that occur in the County of Los Angeles.

Cordially,

  
William Verick

424 First Street, Eureka, CA 95501 • 707.268.8900 (phone) 707.268.8901 (fax)

**SERVICE LIST**

PROPOSITION 65 ENFORCEMENT  
REPORTING  
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

CARUSO AFFILIATED HOLDINGS, LLC  
RICK J. CARUSO, PRESIDENT AND CEO  
101 THE GROVE DR  
LOS ANGELES CA 90036

NBCUNIVERSAL MEDIA, LLC.,  
STEPHEN B BURKE, PRESIDENT  
30 ROCKEFELLER PLZ  
NEW YORK NY 10112



americana Mall, near Glendale, Los Angeles, California

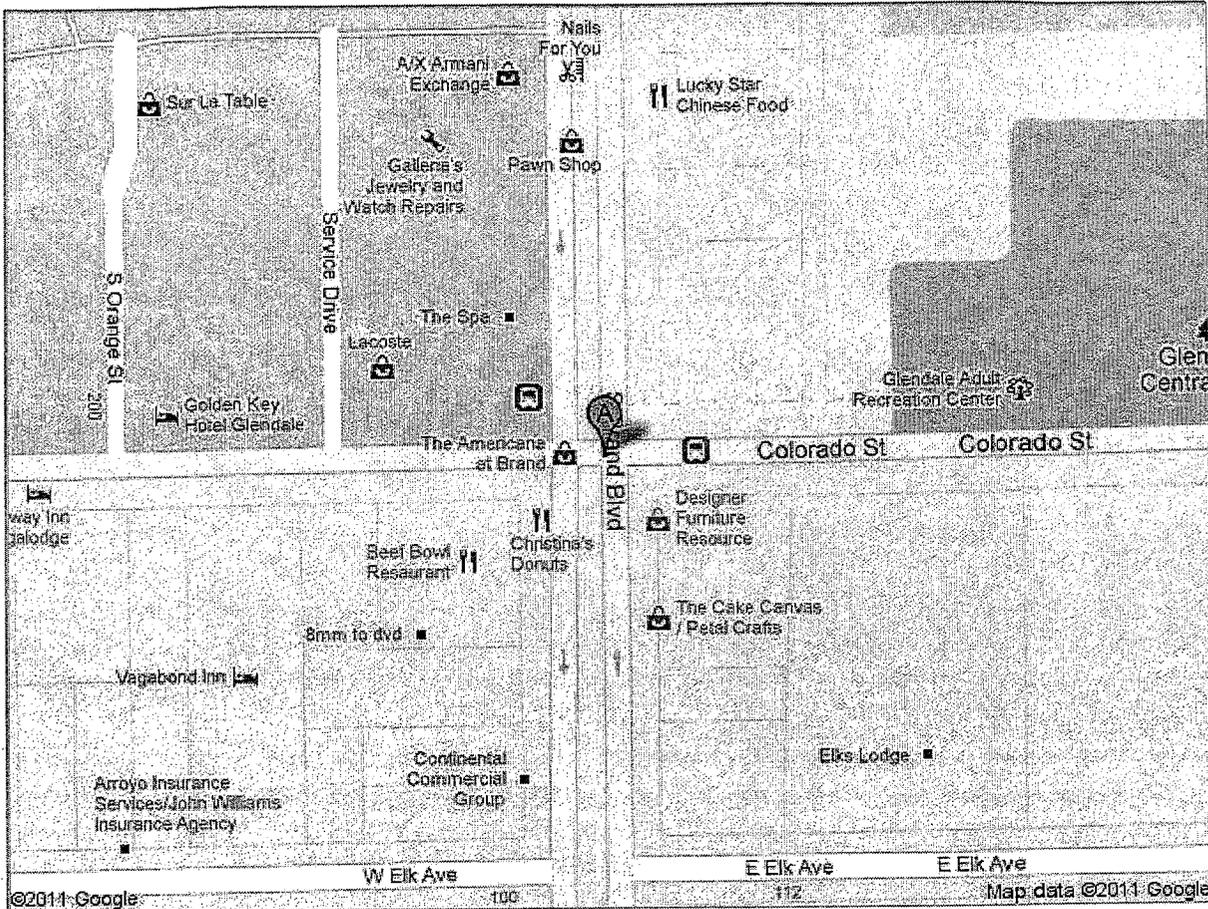
Notes Brass rails on trolley at Americana Mall in Glendale

A. Americana

300 S Brand Blvd, Glendale, California

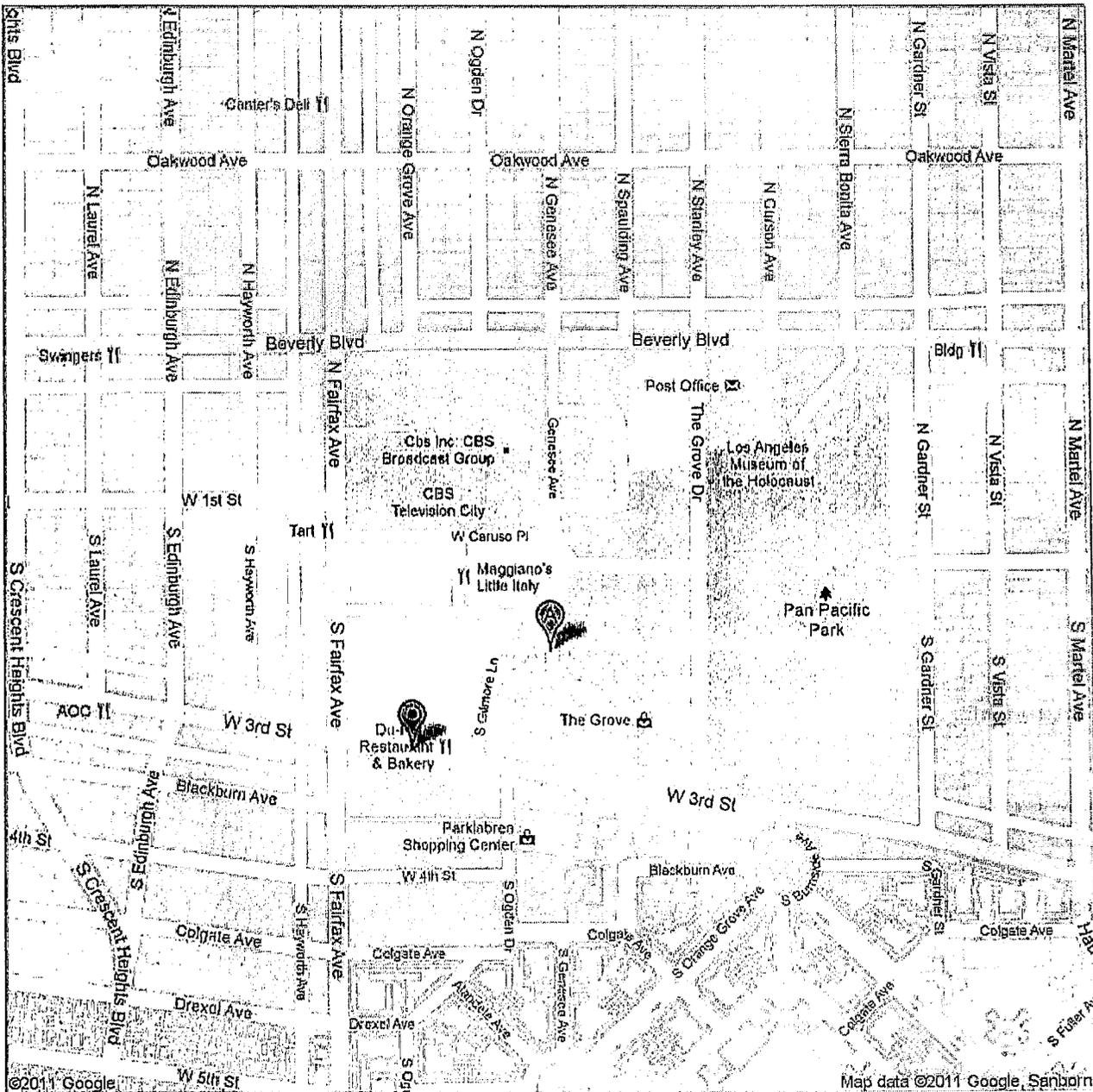
(818) 637-8982

44 reviews





Notes Brass handrail on trolley at The Grove mall in Los Angeles



A. **The Grove**  
 189 The Grove Drive, Los Angeles, CA  
 (323) 900-8080  
 146 reviews



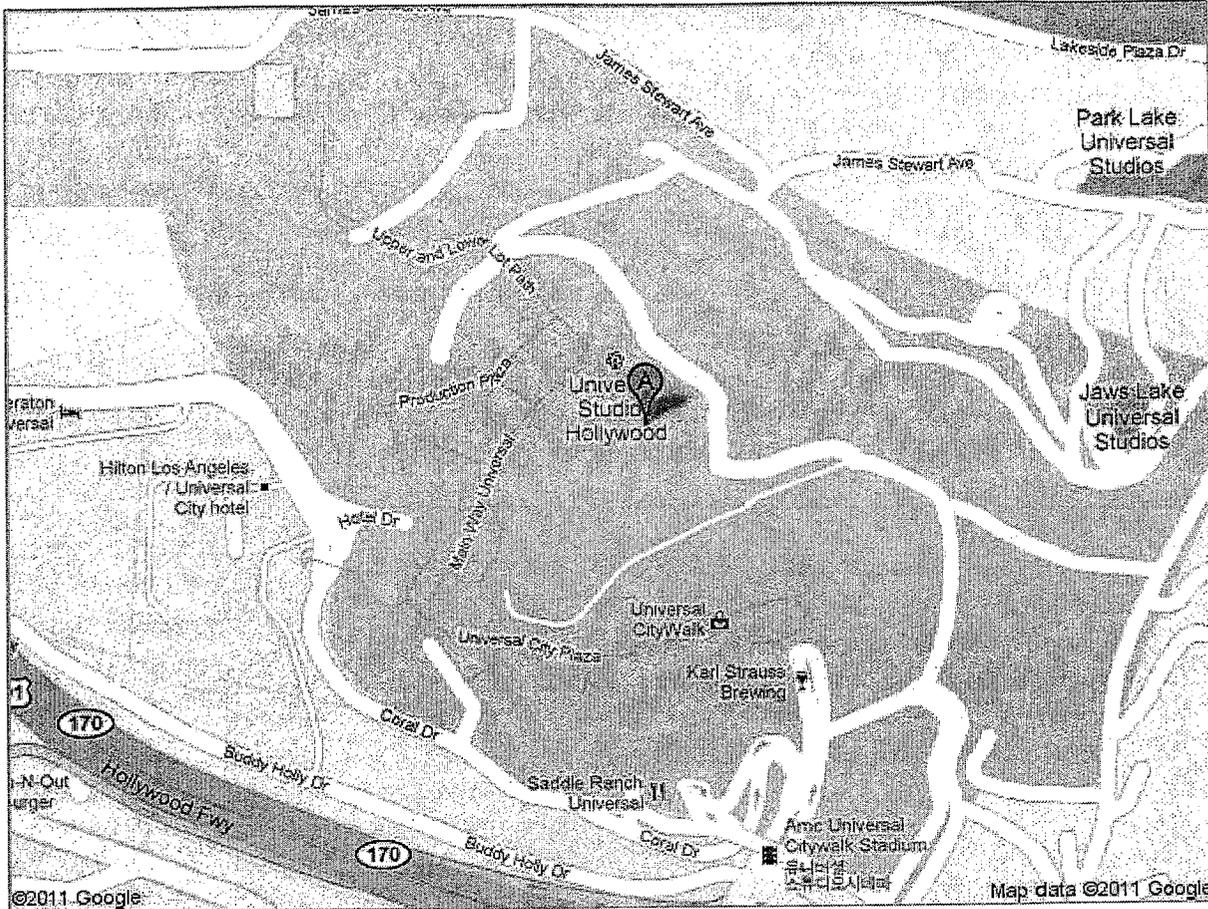
Universal Studios Hollywood, Universal City Notes Hand rail at Globe Theater, Plaza, Los Angeles, CA Universal Studios

A. Universal Studios Hollywood

San Fernando Valley, California

(818) 622-3801

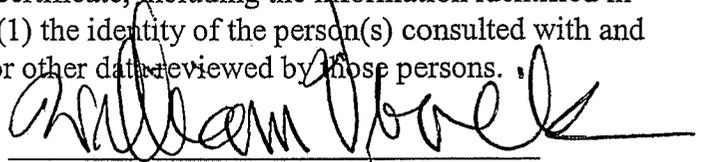
198 reviews



**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: November 2, 2011



William Verick

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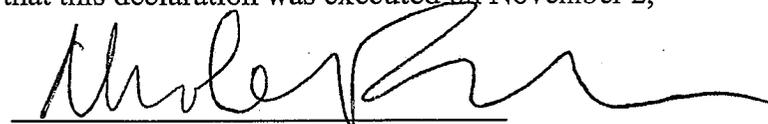
This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed 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 November 2, 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 November 2, 2011, at Eureka, California.



Nicole Frank