

## NOTICE OF VIOLATION

### California Safe Drinking Water and Toxic Enforcement Act

#### Bisphenol A in Socks Made Primarily of Polyester with Spandex

September 1, 2021

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health and Safety Code Section 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act, see the attached summary provided by the California EPA (copies not provided to public enforcement agencies).
- This Notice is provided by the Center for Environmental Health ("CEH"), 2201 Broadway, Suite 508, Oakland, CA 94612, (510) 655-3900. CEH is a nonprofit corporation dedicated to protecting the environment, improving human health and supporting environmentally sound practices. Kaya Allan Sugerman is the Illegal Toxic Threats Program Director of and a responsible individual within CEH.

#### Description of Violation:

- Violator: The names and addresses of the violators are identified on the attached Exhibit 1.
- Time Period of Exposure: The violations have been occurring since at least September 1, 2018 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 bisphenol A ("BPA"). Exposures to BPA occur from use of the products identified in this Notice.
- Type of Product: The specific type of product causing these violations is socks for made primarily of polyester with spandex. The products are worn by females.
- Description of Exposure: This Notice addresses female exposures to BPA. Ordinary use of the products identified in this Notice results in human exposures to BPA. BPA is found in, and comes out of, the products. The routes of exposure for the violations are dermal absorption directly through the skin when individuals wear the products, and ingestion via hand-to-mouth contact after individuals touch or handle the products. No clear and reasonable Proposition

65 warning is provided with these products regarding the presence of BPA in the products.

**Resolution of Noticed Claims:**

Based on the allegations set forth in this Notice, CEH intends to file a citizen enforcement lawsuit against the alleged violators unless such violators agree in a binding written instrument 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 or reformulate such products to eliminate the BPA exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249.7(b). If the alleged violators are interested in resolving this dispute without resort to expensive and time-consuming litigation, please feel free to contact CEH through its counsel identified below. It should be noted that CEH 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 CEH's 60-day Notice. Therefore, while reaching an agreement with CEH 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 relating to the presence or potential presence of BPA in socks; purchase and usage information for such products; efforts to comply with Proposition 65 with respect to such products; communications with any person relating to the presence or potential presence of BPA in such products; and representative exemplars of any such products provided to customers or consumers by the alleged violator in the year preceding this Notice through the date of any trial of the claims alleged in this Notice.

Please direct any inquiries regarding this Notice to CEH's counsel Mark N. Todzo at Lexington Law Group, 503 Divisadero Street, San Francisco, CA 94117, (415) 913-7800, [mtodzo@lexlawgroup.com](mailto:mtodzo@lexlawgroup.com).

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

I, Mark N. Todzo, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice has violated Health & Safety Code §25249.6 by failing to provide clear and reasonable warnings.

2. I am an attorney with the Lexington Law Group, and I represent the noticing party, the Center for Environmental Health.

3. Members of my firm and 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 exposures to the listed chemical that is the subject of the action.

4. Based on the information obtained through those consultations, and on 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 the 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 & 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.

September 1, 2021



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Mark N. Todzo  
Attorney for CENTER FOR  
ENVIRONMENTAL HEALTH

**EXHIBIT 1**  
**September 1, 2021 Notice of Violation**  
**Bisphenol A in Socks Made Primarily of Polyester with Spandex**

<b>Names and Addresses of Responsible Parties</b>	<b>Non-Exclusive Examples of the Products</b>	<b>Further Description of Non-Exclusive Exemplar</b>
<p style="text-align: center;"><b>JCV Group LLC</b>            1000 Sixth Ave, Suite 300            New York, NY 10018</p>	<p style="text-align: center;">Bon Domir baby socks            (8 pairs)</p>	<p style="text-align: center;">UPC No. 8-40046-98576-9            Style # BTFS008-6-12            RN# 150856</p>
<p style="text-align: center;"><b>United Legwear Company, LLC</b>            48 West 38<sup>th</sup> Street 3<sup>rd</sup> Floor            New York, NY 10018</p>	<p style="text-align: center;">Tic Tac Toe Girls Low Cuts            (10 pack)</p>	<p style="text-align: center;">Size 0-12M            Style #:TTT130144-960            1286-18121-0920            UPC No. 8-06409-07381-8</p>
<p style="text-align: center;"><b>Walmart Inc.</b>            702 SW 8<sup>th</sup> Street            Bentonville, Arkansas 72716</p>	<p style="text-align: center;">Wonder Nation Infant Crew Socks            (10 pair)</p>	<p style="text-align: center;">UPC No. 8-89802-10845-5            RN# 52469</p>
<p style="text-align: center;"><b>Puma North America, Inc.</b>            10 Lyberty Way            Westford MA 01886</p>	<p style="text-align: center;">Puma Infant Booties            (4 Pair)</p>	<p style="text-align: center;">Size 0-12M            Style # P116173-109            1010-19117-0920            UPC No. 8-88435-21215-7            RN# 100759</p>
<p style="text-align: center;"><b>ABG Accessories Inc.</b>            1000 Jefferson Ave,            Elizabeth NJ 07021</p>	<p style="text-align: center;">Rising Star Infant Socks            (6 Pairs)</p>	<p style="text-align: center;">Size 6-12 M            Shoe Size 2-4            RN#113512            57760 Z1 06/19            UPC No. 7-94434-40319-2</p>

<p><b>Shalom International Corp.</b> 3 West 35<sup>th</sup> Street New York, NY 10001</p> <p><b>Shalom International Corp.</b> 8 Nicholas Court Suite B Dayton, NJ 08810</p>	<p>So Dorable Booties (8 Pair)</p>	<p>Size 0-12M RN#110023 Item# R959585 UPC No. 0-20748-20432-4</p>
<p><b>Ralph Lauren Corp.</b> 100 Metro Blvd. 4<sup>th</sup> Fl. Nutley NJ 07110</p>	<p>Polo Ralph Lauren Women's Socks</p>	<p>Sock Size 9-11 RN# 55365 UPC No. 0-47852-05209-2</p>
<p><b>ABG Juicy Couture, LLC</b> 1411 Broadway, Fourth Floor New York, NY 10018</p> <p><b>ABG Juicy Couture LLC</b> CSC 251 Little Falls Drive Wilmington DE 19808</p>	<p>Juicy Couture Kids (10 Pairs)</p>	<p>Size 18-24 Months UPC No. 1-93159-11494-7 43JC10318TA-IVH</p>
<p><b>Crest Brands Group</b> 3 West 35<sup>th</sup> Street Floor 5 New York, NY 10001</p> <p><b>JBL Trading LLC</b> 7014 13<sup>th</sup> Ave Suite 202 Brooklyn NY 11228</p>	<p>Pickle &amp; Dot Baby Socks 12 Months (10 Pairs)</p>	<p>RN#155293 PDG171-PNK UPC No. 1-94382-02410-2</p>
<p><b>Ashko Group LLC</b> 10 West 33<sup>rd</sup> Street New York, NY 10001</p>	<p>Bare Hugs Baby Socks (10 Pairs)</p>	<p>Size 12-24 Months UPC No. 7-52229-13481-2 60996-1120</p>
<p><b>Danbar Cool Things, Inc.</b> 77 Bayberry Road South, Lawrence, NY 11559</p>	<p>Danbar Global Stars &amp; Dreamers Infant Socks (8 Pairs)</p>	<p>Size 0-6 Months RN 143333 05011</p>

<p><b>Viacom International Inc.</b> 1501 M Street NW Suite 1100 Washington DC 20005</p> <p><b>High Point Design LLC</b> 1411 Broadway, 8<sup>th</sup> Floor New York, NY 10018</p>	<p>Nickelodeon Pinkfong Baby Shark Socks (5 Pairs)</p>	<p>Size 12-24 Months RN# 109947 UPC No. 0-86694-52752-8</p>
<p><b>Hypnotic Hats, Ltd.</b> 20 West 37<sup>th</sup> Street 5<sup>th</sup> Floor New York, NY 10018</p>	<p>Sole Sayings 3 Pair Low Cut Socks with Grip</p>	<p>Size 6-12M UPC No. 1-92936-11597-9 IN2709 HEATHER</p>
<p><b>GMA Accessories Inc.</b> 3 Empire Blvd. South Hackensack NJ 07606</p>	<p>Charlotte Baby Socks (6 Pairs)</p>	<p>Size 0-6M Color Pnk.Gry/Wh85 RN# 86183 PK27792</p>
<p><b>Reebok Int. Limited</b> 25 Dry Dock Ave Boston, MA 02210</p> <p><b>Reebok Int. Limited</b> 2710 Gateway Oaks Dr. Suite 150N Sacramento CA 95833</p>	<p>Reebok Baby Girl Socks (6 Pack)</p>	<p>12-24 Months RN#132670</p>
<p><b>Russell Brands LLC</b> One Fruit of the Loom Drive Bowling Green, KY 42102</p> <p><b>Russell Brands LLC</b> 421 West Main Street Frankfort KY 40601</p> <p><b>High Point Design, LLC</b> 1411 Broadway 8<sup>th</sup> Floor New York, NY 10018</p>	<p>Spalding Cushioned Sole Baby Socks (6 Pairs)</p>	<p>Size 12-24M RN# 109947 SP042RD</p>

<p><b>Central Carolina Hosiery, Inc.</b> 211 Shady Oak Drive Biscoe, NC 27209</p>	<p>ENVY 3 Pack Crew Socks</p>	<p>Size 12-24 Months Toddler Size 4-6 Article # 711243 Manufacture # CH7102017 RN114624 UPC No. 8-42075-11424-0</p>
<p><b>B2 Fashions Inc.</b> 10301 Blvd. Ray-Lawson Anjou, QC H1J1L6</p>	<p>Elite Collection Non-Slip Socks (2 Pairs)</p>	<p>Size 12-24M Style # 696685 RN# 13387 UPC No. 8-75126-00851-9</p>
<p><b>Target Brands, Inc.</b> 1000 Nicollet Mall Minneapolis MN 55403</p> <p><b>Target Brands, Inc.</b> 1010 Dale St N St. Paul, MN 55117-5603</p>	<p>Xhilaration Low-Cut Socks</p>	<p>Size 4-10 Gray/KX7W UPC No. 4-90250-54220-5</p>
<p><b>K-Swiss Inc.</b> 523 West 6<sup>th</sup> Street, Suite 534 Los Angeles, CA 90014</p> <p><b>Gina Group LLC</b> 10 West 33<sup>rd</sup> Street New York NY 10001</p>	<p>K-Swiss Baby Girl Soft Terry Booties (4 Pairs)</p>	<p>Sock Size 0-12M UPC No. 1-94587-07766-8 Style No. Q-KSL-IG551/4 RN# 121229</p>
<p><b>L.C. Licensing, Inc. dba Ellen Tracy</b> 1441 Broadway New York, NY 10018</p> <p><b>Ellen Tracy, LLC</b> 251 Little Falls Drive Wilmington, DE 19808</p> <p><b>McCubbin Hosiery, LLC</b> 5310 NW 5th St Oklahoma City, OK 73127</p>	<p>Ellen Tracy Performance Foot Liners (6 Pairs)</p>	<p>Shoe Size 4-10 UPC No. 7-51038-85703-5 RN 33702</p>

<p><b>Basic Resources, Inc. Dba PVH Legwear Corp.</b> 1411 Broadway 2<sup>nd</sup> Floor New York, NY 10018</p> <p><b>PVH Corp.</b> 200 Madison Ave New York, NY 10016</p>	<p>Tommy Hilfiger No Show Women's Socks (6 Pairs)</p>	<p>One Size RN# 160183 SKY No. 1-94882-05564-4</p>
<p><b>Infinity Classic International</b> 1528 49<sup>th</sup> Street Ste 2B Brooklyn, NY 11219</p>	<p>MeMoi Heathered Low Cuts (10 Pairs)</p>	<p>Sock Size 9-11 Shoe Size 4-10 RN# 84164 MLF06890</p>
<p><b>USA Legwear LLC</b> 31 West 34<sup>th</sup> Street 6<sup>th</sup> Floor New York, NY 10001</p>	<p>New Balance Active Cushion Ladies Low Cut Performance Socks (6 Pair)</p>	<p>UPC No. 8-86028-39625-3 RN# 132670</p>
<p><b>Centric Socks LLC</b> 350 Fifth Ave, 9<sup>th</sup> Fl New York, NY 10118</p> <p><b>GBG USA, Inc.</b> 350 Fifth Ave, 10<sup>th</sup> Floor New York, NY 10118</p>	<p>Lucky Brand No Show Sock (9 Pairs)</p>	<p>Size 4-10 SKY No. 1-93159-11799-3 RN#89888</p>
<p><b>F21 Opco, LLC</b> 3880 N. Mission Road Los Angeles, CA 90031</p> <p><b>Forever 21, Inc.</b> 3880 North Mission Road Los Angeles CA 90031</p>	<p>Forever 21 Disney Socks</p>	<p>One Size Heather Grey/Multi RN# 94981</p>
<p><b>Gina Group, LLC</b> 10 W 33<sup>rd</sup> Street 3<sup>rd</sup> Floor New York, NY 10001</p>	<p>Betsey Johnson Sneaker Liners Shoe Size 5-10 (6 Pairs)</p>	<p>UPC No. 1-94587-29354-9 RN#121229</p>



<p><b>Gina Group, LLC</b>  10 W 33<sup>rd</sup> Street  3<sup>rd</sup> Floor  New York, NY 10001</p>	<p>Steve Madden Low Cuts  (10 Pairs)</p>	<p>Show Size 5-10  RN #121229  UPC No. 7-31351-66774-0</p>
<p><b>DML Marketing Group, Ltd.</b>  7711 Hayvenhurst Ave.  Van Nuys, CA 91406</p>	<p>Legale Ladies Socks  (10 Pair) Grey</p>	<p>Shoe Size 4-10  UPC No. 7-17874-65532-7</p>
<p><b>HRLY Brands Holding LLC</b>  240 Madison Ave  15<sup>th</sup> Floor  New York, NY 10016</p> <p><b>United Legwear Co. LLC</b>  48 West 38<sup>th</sup> Street  3<sup>rd</sup> Floor  New York, NY 10018</p>	<p>Hurley Women's No Show  (6 Pack)</p>	<p>Shoe Size 5-9.5  Sock 9-11  UPC No. 8-06409-44375-8  Style# H116729-427</p>
<p><b>1616 Holdings, Inc.</b>  701 Market Street, Suite 200  Philadelphia PA 19106</p> <p><b>Five Below, Inc.</b>  701 Market Street Suite 300  Philadelphia PA 19106</p>	<p>5 Style Ladies Low Cut  Socks (15 Pairs)</p>	<p>Size 9-11  Style# 15-L24478FV  UPC No. 1-922346-200182</p>
<p><b>Hanesbrands Inc.</b>  1000 E. Hanes Mill Rd  Winston-Salem, NC 27015</p>	<p>Champion Women's Super  No-Show  Socks  (6 Pairs)</p>	<p>Shoe Size 5-9  RN#15763  SKY No. 0-38257-13339-4</p>
<p><b>Hanesbrands Inc.</b>  1000 E. Hanes Mill Rd  Winston-Salem, NC 27015</p>	<p>Hanes Infant Girls' Super  Soft Low-Cut Socks  (10 Pair)</p>	<p>Size 6-12M  RN15763  UPC No. 0-38257-20510-7</p>

<p><b>With You E-Commerce Inc.</b> 14556 Ventura Blvd Encino, CA 91403</p> <p><b>With You LLC</b> 1407 Broadway 38<sup>th</sup> Floor New York, NY 10018</p>	<p>Jessica Simpson No Show Socks (10 Pairs)</p>	<p>Shoe Size 4-10 RN# 145219 Style No. JS15703WW-MU UPC No. 1-90131-07588-3</p>
<p><b>Renfro Corporation</b> 661 Linville Road Mount Airy, NC 27030</p>	<p>Dr. Scholl's Women's Diabetes &amp; Circulatory Low- Cut Socks (6 Pair)</p>	<p>Shoe Size 4-10 RN# 14177 UPC No. 0-42825-74144-7</p>
<p><b>Wal-Mart Stores, Inc.</b> 702 SW 8<sup>th</sup> Street Bentonville, AK 72712</p> <p><b>Walmart Inc.</b> 702 SW 8<sup>th</sup> Street Bentonville, AK 72712</p>	<p>No Boundaries Liner Sock (6 Pair)</p>	<p>Shoe Size 4-10 RN# 52469 UPC No. 0-86694-53508-0</p>
<p><b>Implus Footcare LLC</b> 2001 T.W. Alexander Drive Durham, NC 27709</p>	<p>Apara Footie Socks (5 Pair)</p>	<p>Women's 5-10 Item# 98843 UPC No. 0-96506-98843-0</p>
<p><b>Asics America Corporation</b> 7755 Irvine Center Drive Suite 400 Irvine, CA 92618</p>	<p>Asics Cushion Low Cut Socks (3 Pair)</p>	<p>Medium Shoe Size 7-10 UPC No. 8-87749-32800-4</p>
<p><b>Gaiam Americas, Inc.</b> 601 West 26<sup>th</sup> Street Floor 9 New York, NY 10001</p> <p><b>Fit for Life LLC</b> 833 W South Boulder Rd Suite G Louisville, CO 80027-2452</p>	<p>Gaiam Super Grippy Yoga Socks</p>	<p>One Size Fits Most UPC No. 018713-64077-2 SKU 05-64077</p>

<p><b>Aeropostale, Inc.</b> 112 West 34<sup>th</sup> Street New York, NY 10120</p> <p><b>Orly Shoe Corp.</b> 15 West 34<sup>th</sup> Street 7<sup>th</sup> Floor New York, NY, 10001</p>	<p>Aeropostale Women's Socks</p>	<p>UPC No. 6-91466-49189-3 RN# 150855</p>
<p><b>Skechers USA, Inc.</b> 228 Manhattan Beach Blvd. Manhattan Beach, CA 90266</p>	<p>Skechers Girls Anklet Socks (6 Pair)</p>	<p>Fits 12-24M Style# S110569BB-035 Sock Size 12-24M UPC No. 8-06409-43942-3</p>
<p><b>Fruit of the Loom, Inc.</b> One Fruit of the Loom Drive Bowling Green, KY 42102</p> <p><b>Gold Inc.</b> 511 16<sup>th</sup> Street #400 Denver Co 80202</p>	<p>Fruit of the Loom Toddler Girls Everyday Active</p>	<p>Age 6-18 months SKU 8-89802-09672-1 FL00307</p>

1 **PROOF OF SERVICE**

2  
3 I, Alexis Pearson, declare:

4 I am a citizen of the United States and employed in the County of San Francisco, State of  
5 California. I am over the age of eighteen (18) years and not a party to this action. My business  
6 address is 503 Divisadero Street, San Francisco, CA 94117 and my email address is  
apearson@lexlawgroup.com.

7 On September 1, 2021, I served the following document(s) on all interested parties in this  
8 action by placing a true copy thereof in the manner and at the addresses indicated below:

9 **NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND  
10 TOXIC ENFORCEMENT ACT;**

11 **CERTIFICATE OF MERIT;** and

12 **THE SAFE DRINKING AND TOXIC ENFORCEMENT ACT OF 1986  
13 (PROPOSITION 65): A SUMMARY** (only sent to those on service list marked with an  
14 asterisk).

15  **BY MAIL:** I am readily familiar with the firm's practice for collecting and processing mail  
16 with the United States Postal Service ("USPS"). Under that practice, mail would be deposited  
17 with USPS that same day with postage thereon fully prepaid at San Francisco, California in the  
18 ordinary course of business. On this date, I placed sealed envelopes containing the above  
19 mentioned documents for collection and mailing following my firm's ordinary business practices.

20 *Please see attached service list.*

21  **BY ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via  
22 email to the email address(es) indicated on the attached service list [or noted above] before 5 p.m.  
23 on the date executed.

24 Stacey Grassini, Deputy District Attorney  
25 Contra Costa County  
26 900 Ward Street  
27 Martinez, CA 94553  
28 sgrassini@contracostada.org

Bud Porter  
Supervising Deputy District Attorney  
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Thomas L. Hardy, District Attorney  
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4 Paul E. Zellerbach, District Attorney  
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7 Jeff W. Reisig, District Attorney  
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 1, 2021 at San Francisco, California.



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Alexis Pearson

## SERVICE LIST

District Attorney of Alpine County  
P.O. Box 248  
Markleeville, CA 96120

District Attorney of Amador County  
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Jackson, CA 95642

District Attorney of Butte County  
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Oroville, CA 95965

District Attorney of Colusa County  
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Colusa, CA 95932

District Attorney of Del Norte County  
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Crescent City, CA 95531

District Attorney of El Dorado County  
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Placerville, CA 95667

District Attorney of Fresno County  
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Fresno, CA 93721

District Attorney of Glenn County  
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District Attorney of Humboldt County  
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Eureka, CA 95501

District Attorney of Imperial County  
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El Centro, CA 92243

District Attorney of Kern County  
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Bakersfield, CA 93301

District Attorney of Kings County  
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Hanford, CA 93230

District Attorney of Lake County  
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District Attorney of Los Angeles County  
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District Attorney of Marin County  
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