

December 18, 2023

*Via First Class Mail and E-Mail*

Tony Lefebvre, CEO  
Signature Aviation  
13485 Veterans Way Ste. 600  
Orlando, FL 32827

Richard Dahlson, Attorney  
Downstream Aviation, LP  
901 Main Street, Ste. 600  
Dallas, TX 75202  
rdahlson@jw.com

Trenton H. Norris  
Arnold & Porter Kaye Scholer LLP  
Three Embarcadero Center, 10th Floor  
San Francisco, CA 94111  
trent.norris@aporter.com

**Re: *Center for Environmental Health v. Aerodynamic Aviation, et al.*  
Case No. RG-11600721 – Commercially Available Unleaded Avgas**

Dear Mr. Lefebvre and Mr. Dahlson,

I am writing on behalf of my client the Center for Environmental Health (“CEH”) regarding Section 2.3 of the Consent Judgment entered by the Court on December 9, 2014 (the “Consent Judgment”). A copy of the Consent Judgment is enclosed with the electronic copy of this notice.

The Consent Judgment covers Downstream Aviation, LP, which is now owned by Signature Aviation. Thus, Signature Aviation is required to comply with the terms of the Consent Judgment. Pursuant to Section 2.3.1(a) of the Consent Judgment, Signature Aviation is required to distribute in California Avgas with the lowest concentration of lead approved for aviation use that is commercially available to Signature Aviation. In September 2022, G100UL was approved for aviation use by the Federal Aviation Administration (“FAA”). G100UL is an unleaded fuel that may be used in all general aviation piston aircraft. It can and should therefore serve as a lower lead replacement for the 100LL fuel you are presently distributing. Production of G100UL has now begun such that it will be available to Signature Aviation for distribution and sale in California by early 2024.

Accordingly, Signature Aviation must agree to comply with its obligations under the Consent Judgment and begin distributing G100UL on or before March 1, 2024 in California. If

Signature Aviation is not distributing G100UL in California by that date, Signature Aviation will be in violation of Section 2.3.1(a) of the Consent Judgment and CEH intends to pursue its available remedies provided therein. Please feel free to contact me if you wish to discuss this matter.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'M. Todzo', with a long horizontal flourish extending to the right.

Mark N. Todzo

Encl. (Electronic Version Only)