

# EXHIBIT B

# NRDC

December 21, 2018

VIA EMAIL AND U.S. CERTIFIED MAIL

Michigan Department of Attorney General  
Attn: Richard S. Kuhl, Assistant Attorney General  
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Michigan Department of Environmental Quality  
Attn: George Krisztian  
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Re: Notice of State of Michigan's Violations of Settlement Agreement in  
*Concerned Pastors for Social Action v. Khouri*, No. 16-10277 (E.D. Mich.)

Messrs. Kuhl and Krisztian:

Pursuant to Paragraph 128 of the Settlement Agreement, Plaintiffs provide notice to the State concerning a dispute over the State's noncompliance with Paragraph 85 of the Agreement.

Paragraph 66 requires the State to maintain the CORE program such that the State can meet its obligations under the Agreement to provide Flint residents with filter education, installation, and maintenance services. Settlement Agmt. ¶ 66, ECF No. 147-1. In turn, Paragraph 85 requires the CORE program to complete initial visits (including second attempts at in-person contact, when appropriate, *see id.* ¶ 73) to all new Flint water customers within 14 days of receiving notice of new customers from the City of Flint. *Id.* ¶ 85. The purpose of Paragraph 85 is to ensure that new water customers in the City, and water customers that have moved between homes within the City, have properly installed and maintained filters.

**NATURAL RESOURCES DEFENSE COUNCIL**

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The obligation under Paragraph 85 to visit new customers remains ongoing. The State therefore must maintain sufficient CORE staff to complete these required new customer visits beyond December 31, 2018. Based on Mr. Kuhl's December 19, 2018 email, it is clear that the State plans to eliminate all staff for the CORE program as of the end of 2018. This will result in a violation of the State's obligations under Paragraph 85.

Plaintiffs are available to meet and confer with the State regarding this issue.

Sincerely,

A handwritten signature in black ink that reads "Sarah C. Tallman". The signature is written in a cursive style and is positioned above a horizontal line.

Sarah C. Tallman

cc (via email):

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