

PRO VERITAS LAW LLP

Attorneys at Law

SECOND NOTICE — COMPLIANCE REMEDIATION DEMAND

April 23, 2026

Via Electronic Mail

Norcal Music & Arts Center

761 E El Camino Real, Sunnyvale, CA 94087, USA

Sunnyvale, CA

SECURE ACCESS CREDENTIALS

Reference: PV-2026-00378-VK69

Access Code: 89976

View details at: proveritaslaw.com/lookup

Re: Second Demand Notice — ncmac.net

Our File Reference: PV-2026-00378-VK69

Prior Correspondence: Demand Notice dated April 5, 2026

On April 5, 2026, this office transmitted a Demand Notice (Ref: PV-2026-00378-VK69) to contact@ncmac.net, which is the officially designated email address for contact listed on your website and publicly available business records for ncmac.net.

In good faith, and consistent with our obligation to pursue voluntary resolution before initiating formal proceedings, we make this second attempt to reach you regarding serious and ongoing violations of California and federal law identified on your website.

As of the date of this letter, we have received no response, no payment, and no indication that the identified violations have been remediated. Our continuous monitoring confirms that all previously identified violations persist.

ESTABLISHMENT OF NOTICE

Pursuant to California law, the initial Demand Notice transmitted on April 5, 2026 to your publicly designated business contact address constitutes effective notice under the following authorities:

- Cal. Civ. Code § 1583 — A communication to the place of business designated by the party is effective upon transmission.
- Cal. Civ. Proc. Code § 1013(a) — Service by electronic means to the address of transmission is complete at the time of transmission.
- *Khourie, Crew & Jaeger v. Sabek, Inc.*, 220 Cal. App. 3d 1009 (1990) — Notice sent to a party's designated business address is presumed received.
- *Jones v. Flowers*, 547 U.S. 220 (2006) — Due process is satisfied when notice is sent to the address reasonably calculated to reach the intended recipient.
- Cal. Evid. Code § 641 — A letter correctly addressed and properly mailed is presumed to have been received in the ordinary course of mail.

Therefore, your business has been on notice of these violations since April 5, 2026. Any continued failure to remediate constitutes a willful and knowing violation, and your inaction is directly contributing to the ongoing accrual of damages. You are now knowingly failing to mitigate damages, which courts may consider as an aggravating factor in any subsequent proceedings.

ESCALATED ESTIMATED STATUTORY EXPOSURE

Statute	Letter A (Apr 5)	Current (Apr 23)	Change
CIPA (Cal. Pen. Code § 637.2)	\$15,000	\$20,000	+\$5,000
VPPA (18 U.S.C. § 2710)	\$7,500	\$12,500	+\$5,000
TOTAL ESTIMATED EXPOSURE	\$22,500	\$32,500	+\$10,000

Notice: The figures above represent estimated statutory damages only and do not include attorney fees, costs of litigation, injunctive relief, or potential punitive damages. Additional plaintiffs continue to be identified and onboarded. Continued inaction will result in further increases to your estimated exposure.

CONTINUED VIOLATIONS

CIPA Violations: Your website continues to deploy 1 third-party tracking technology — including Google Analytics — that intercept, record, and transmit visitor communications without prior consent, in violation of California Penal Code §§ 631 and 637.2.

VPPA Violations: Your website continues to disclose video viewing activity to 1 third-party provider without subscriber consent, in violation of the Video Privacy Protection Act (18 U.S.C. § 2710).

FORMAL DEMAND

We formally demand that your business:

1. Immediately remediate all CIPA, ADA/Unruh, and VPPA violations identified on nmac.net and documented in this letter;
2. Implement a documented ongoing compliance monitoring program to prevent recurrence; and
3. Remit appropriate compensation to our clients for the ongoing accrual of statutory damages.

To review the complete violation record and your current statutory exposure, visit proveritaslaw.com/lookup using the Reference Number and Access Code provided above. This matter must be addressed within 30 days of this letter, on or before May 23, 2026.

CONSEQUENCES OF CONTINUED NON-RESPONSE

- Our clients will authorize the filing of a civil complaint in California Superior Court.
- You will be formally served with process, triggering mandatory response obligations within 30 days.
- Attorney fees, litigation costs, and interest will be added to the damages sought.
- The matter will become part of the permanent public court record.

REMEDICATION AND SETTLEMENT

If your business takes prompt action to remediate the compliance gaps identified in this letter and commits to ongoing compliance monitoring, our clients are prepared to consider a significantly reduced settlement. Documented remediation and a commitment to continued compliance will be a material factor in determining final settlement terms.

The following compliance remediation resources may assist you. These are recommendations only and are not endorsed by this firm.

- APFCompliant — apfcompliant.com
- accessiBe — accessibe.com
- ADA Site Compliance — adasitecompliance.com

You may also engage any other qualified website privacy and accessibility compliance firm of your choosing.

EVIDENCE PRESERVATION

You are hereby on notice of potential litigation. You must immediately preserve all records, server logs, analytics configurations, tracking scripts, and any data related to your website's third-party integrations. Spoliation of evidence after notice will result in adverse inference motions and may constitute an independent basis for sanctions.

All communications regarding this matter must be directed in writing to contact@proveritaslaw.com.

Sincerely,

Pro Veritas Law LLP
On behalf of our clients
