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Exempt from filing fees
Gov. Code, § 6103

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Case No.

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

FRONTIER CALIFORNIA, INC., a California Corporation,

Defendant.

COMPLAINT FOR PERMANENT INJUNCTION, CIVIL PENALTIES, AND OTHER EQUITABLE RELIEF

(Health & Saf. Code, § 25100 et seq.; Bus & Prof. Code, § 17200 et seq.)

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PRE-FILING VERSION

1 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, based on information and
2 belief, allege as follows:

3 **PLAINTIFF**

4 1. Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, brings this action by
5 and through Rob Bonta, Attorney General of the State of California (“Attorney General”); Pamela
6 Y. Price, District Attorney of Alameda County; and Stephen M. Wagstaffe, District Attorney of
7 San Mateo County (collectively referred to herein as “the People” or “Plaintiff(s”).

8 2. Pursuant to Health and Safety Code sections 25145.4 and 25182, each of the
9 Plaintiffs may bring a civil action in the name of the People of the State of California to enjoin
10 any violation of chapter 6.5 of division 20 of the Health and Safety Code (“Chapter 6.5”) and to
11 seek civil penalties for violations of Chapter 6.5. Pursuant to Government Code section 12607,
12 the Attorney General may maintain an action for equitable relief in the name of the People of the
13 State of California against any person for the protection of the natural resources of the state from
14 pollution, impairment, or destruction.

15 3. Pursuant to Business and Professions Code sections 17203, 17204, and 17206,
16 each of the Plaintiffs may bring a civil action in the name of the People of the State of California
17 to enjoin any person who engages, has engaged, or proposes to engage in unfair competition, as
18 defined in Business and Professions Code section 17200, and for civil penalties for each violation
19 of Business and Professions Code section 17200 et seq.

20 4. Plaintiff brings this action without prejudice to any other actions or claims which
21 Plaintiff may have based upon separate, independent, and unrelated violations arising out of
22 matters or allegations that are not set forth in this Complaint.

23 **DEFENDANT**

24 5. Defendant, FRONTIER CALIFORNIA, INC. (hereinafter, “Defendant”)¹ is now,
25 and at all times mentioned in this Complaint was, a California corporation. Defendant currently

26 ¹ Frontier California, Inc. was previously known as Verizon California, Inc. Verizon
27 California, Inc. changed its name to Frontier California, Inc. in or around April 2016 in
28 connection with Frontier Communications Corp.’s purchase of certain wireline assets of Verizon
Communications Inc., including Verizon California, Inc. Frontier California, Inc. is liable for the
(continued...)

1 conducts and has conducted business in the State of California at facilities owned and/or operated
2 by Defendant (collectively referred to as “Covered Facilities” and further described in paragraph
3 18 below). Defendant manages certain Target Waste (defined in paragraph 19 below) that
4 constitutes hazardous wastes, including universal wastes, at, or in connection with, Defendant’s
5 Covered Facilities throughout California, including one or more Covered Facilities in Los
6 Angeles County.

7 6. Defendant is, and at all times relevant to the claims in this Complaint were, legally
8 responsible for compliance with the provisions of Health and Safety Code, Chapter 6.5, and the
9 corresponding implementing regulations, in connection with Defendant’s ownership and/or
10 operation of Defendant’s Covered Facilities.

11 7. Defendant is a “person” as defined in Health and Safety Code section 25118.

12 8. In this Complaint when reference is made to any act or omission of “Defendant,”
13 such allegations shall include the acts and omissions of owners, officers, directors, agents,
14 employees, contractors, vendors, affiliates, and/or representatives of Defendant while acting
15 within the course and scope of their employment or agency on behalf of the above referenced
16 entity.

17 **JURISDICTION AND VENUE**

18 9. Venue is proper in this county pursuant to Health and Safety Code section 25183,
19 in that some of the violations alleged in this Complaint occurred in the County of Los Angeles
20 and throughout the State of California. This Court has jurisdiction pursuant to Article 6, section
21 10 of the California Constitution and Code of Civil Procedure section 393.

22 10. Plaintiff and Defendant have entered into a series of agreements to toll any
23 applicable statutes of limitation. As a result of those agreements, a total of at least 4,025 days
24 will not be included in computing the time limited by any statutes of limitation applicable to the
25 causes of action brought against Defendant based on claims covered by the tolling agreement.
26 Those claims include the claims alleged in this action against Defendant.

27 _____
28 violations that occurred prior to the ownership and name change during the relevant time period
from October 25, 2008 through the date of the filing of the Complaint at the Covered Facilities.

1 issued; or that the remedy at law is inadequate, and the temporary restraining order, preliminary
2 injunction, or permanent injunction shall issue without such allegations and without such proof.

3 15. Business and Professions Code section 17200 through 17208 (the “Unfair
4 Competition Law” or “UCL”) provide for civil liability for any person who engages in unfair
5 competition, which section 17200 defines in relevant part to include any “unlawful...business act
6 or practice.”

7 16. The UCL, pursuant to Business and Professions Code sections 17203 and 17204,
8 authorizes the Court to issue an order that enjoins any person who engages, has engaged or
9 proposes to engage in unfair competition. The UCL also provides, pursuant to Business and
10 Professions Code section 17205, that the remedies or penalties provided by the UCL are
11 cumulative to each other and to the remedies or penalties available under all other laws of this
12 state.

13 **GENERAL ALLEGATIONS**

14 17. The allegations in this Complaint relate solely to Defendant’s compliance with the
15 HWCL and UCL at, or in connection with, Defendant’s Covered Facilities in California and
16 pertain only to the management of Target Waste. Nothing in this Complaint relates to or pertains
17 to any existing or potential claims or causes of action arising out of either or both (a) Defendant’s
18 ownership or operation of any non-Covered Facility in California; or (b) the management or
19 disposal of any non-Target Waste items at or from any facility owned or operated by Defendant in
20 California, including, but not limited to, Defendant’s Covered Facilities, and such claims or causes
21 of action, if any, are reserved by Plaintiff. This Complaint has been filed within five years of the
22 People discovering the HWCL violations alleged herein and the HWCL allegations in this
23 Complaint cover the period from on or about October 25, 2008, through the date of the filing of
24 the Complaint, exclusive of any applicable tolling periods, including those set forth in paragraph
25 10 herein. The UCL allegations in this Complaint cover the four years prior to the date of filing of
26 this Complaint, exclusive of any applicable tolling periods, including those set forth in paragraph
27 10 herein.

28

1 18. At all times relevant hereto and continuing from and after the date of filing of this
2 Complaint, Defendant owned and/or operated, and continues to own and/or operate, Covered
3 Facilities throughout California. The term “Covered Facilities” as used herein shall means those
4 facilities in California that are owned or operated by Defendant or were owned and/or operated for
5 a portion of the period covered by this Complaint as listed on the attached Exhibit A.

6 19. At all times relevant hereto, Defendant provided broadband internet, digital
7 television, and computer technical support services to residential and business customers in
8 California. In providing these services, Defendant, by and through their employees at Defendant’s
9 Covered Facilities, including but not limited to, warehouse personnel and field technicians,
10 manage large volumes of electronic equipment (such as remote controls, splitters, splitter filters,
11 transformers, power adapters, power supplies, DVRs, modems, network interface units, routers,
12 field testing equipment, and other devices containing printed circuit boards), batteries (such as
13 lead-acid, lithium-ion, nickel-cadmium, nickel-metal hydride, and alkaline batteries), scrap metal,
14 and aerosol cans, as well as certain gels, liquids and other items used or carried by technicians
15 (specifically, sealants, adhesives, and silicone) that have become hazardous waste within the
16 meaning of Health and Safety Code sections 25117 and 25124, and Title 22 (collectively the
17 “Target Waste”). Defendant and its technicians used these items in the course of their duties or
18 leased them to customers, to be reclaimed by Defendant at the end of a contract or when upgrading
19 equipment. At all times relevant hereto and continuing from and after the date of filing of this
20 Complaint, Target Waste, including electronic equipment, batteries, and aerosol cans handled by
21 Defendant at Defendant’s Covered Facilities or in the field in the course and scope of field
22 technicians employment, was rendered unusable for its intended purposes as the result of usage,
23 damage, age, wear, obsolescence and other causes, and was required to be handled and recycled or
24 disposed of in compliance with the HWCL.

25 20. At all times relevant to this Complaint, Defendant is or was responsible for the
26 operation of Defendant’s Covered Facilities in California. At all times relevant to this Complaint,
27 Defendant was aware of and did conduct, approve and/or control hazardous waste management
28 activities for the Target Waste at Defendant’s Covered Facilities. At all times relevant to this

1 Complaint, Defendant's actions and/or omissions, as part of a continuing course of conduct, are or
2 were the legal cause of the violations alleged herein, and Defendant reasonably could have taken
3 action to prevent the unlawful actions and/or omissions.

4 21. Plaintiff is informed and believes, and thereupon alleges, that at all times relevant
5 to this Complaint, Defendant generated hazardous waste at each of Defendant's Covered Facilities
6 during every ninety (90) day period.

7 22. Plaintiff alleges that Defendant at all times relevant hereto and continuing from
8 and after the date of filing of this Complaint, caused and/or performed each of the acts and/or
9 omissions in violation of the HWCL in the ownership and/or operation of Defendant's Covered
10 Facilities, and with regard to Target Waste, as alleged below:

11 ***Disposal Violations***

12 a. Disposed, or caused the disposal of Target Waste at a point not authorized, in
13 violation of Health and Safety Code section 25203;

14 ***Waste Determination Violations***

15 b. Failed to determine if a generated Target Waste was a "hazardous waste" as
16 required by Title 22, sections 66262.11 and 66260.200, subdivision (c);

17 ***Storage and Accumulation Time Limit Violations***

18 c. Stored Target Waste onsite beyond the time permitted by law at a facility that
19 did not have a hazardous waste storage permit from the California Department of Toxic
20 Substances Control ("DTSC"), in violation of Title 22, section 66262.34,² and Health and Safety
21 Code section 25123.3, subdivision (h);

22 ***Labeling and Container Violations***

23 d. Failed to properly label containers of accumulated Target Waste in violation of
24 Title 22, section 66262.34, subdivision (f);

25 e. Failed to maintain containers holding Target Waste at Defendant's Covered
26 Facilities capable of being closed while in storage, in violation of Title 22, section 66265.173;

27 ² Effective July 1, 2024, Section 66262.34 was repealed and replaced by new sections,
28 including Sections 66262.16 and 66262.17. References herein to Section 66262.34 include
Sections 66262.16 and 66262.17, as applicable.

1 f. Failed to properly manage, mark, and store hazardous waste aerosol cans, in
2 violation of Health and Safety Code section 25201.16;

3 ***Transportation and Manifest Violations***

4 g. Delivered, or otherwise transferred custody or possession of Target Waste to a
5 person or entity that was not properly licensed and registered to transport hazardous waste, in
6 violation of Health and Safety Code section 25163, subdivision (a)(1);

7 h. Transported Target Waste without being properly licensed and registered to
8 transport hazardous waste, in violation of Health and Safety Code section 25163, subdivision
9 (a)(1);

10 i. Transported, or caused to be transported, Target Waste to unauthorized
11 locations, in violation of Health and Safety Code section 25189.5;

12 j. Failed to submit to DTSC a legible copy of each manifest used within thirty
13 (30) days of each shipment of Target Waste off-site or into California, in violation of Title 22,
14 section 66262.23, subdivision (a)(4);

15 ***Training Violations***

16 k. Failed to comply with employee training obligations for employees who are
17 assigned to Defendant's Covered Facilities and who handled Target Waste as set forth in Title 22,
18 sections 66265.16 and 66273.36, including but not limited to, the requirements to maintain
19 training documentation as specified in these regulations for each employee involved in the
20 handling of hazardous waste;

21 ***Universal Waste Violations***

22 l. Stored Target Waste that constitutes universal waste onsite beyond the time
23 permitted by law, in violation of Title 22, section 66273.35;

24 m. Failed to properly label containers of accumulated Target Waste that constitutes
25 universal waste, in violation of Title 22, sections 66273.34 and 66273.35, subdivision (b);

26 n. Sent, transported, relinquished, transferred, surrendered or otherwise took
27 Target Waste that constitutes universal waste to an unauthorized location, in violation of Title 22,
28 sections 66273.38, 66273.39, 66273.40 and 66273.41;

1 o. With respect to Target Waste that constitutes universal waste, failed to comply
2 with notification requirements for a universal waste handler, in violation of Title 22, section
3 66273.32;

4 p. Failed to retain copies of all bills of lading pertaining to shipments of Target
5 Waste that constitutes universal waste for three years, in violation of Title 22, section 66273.39;

6 q. Failed to keep a record with the information required by Title 22, section
7 66273.39, subdivision (a)(1) – (3), of each shipment of Target Waste that constitutes universal
8 waste received at the universal waste handler’s facility, in violation of Title 22, section 66273.39;

9 r. Failed to comply with employee training obligations for employees who are
10 assigned to Covered Facilities and who handled Target Waste that constitutes universal waste, as
11 set forth in Title 22, section 66273.36, including but not limited to the requirements to maintain
12 training documentation as specified in these regulations for each employee involved in the
13 handling of universal waste; and

14 ***Generator ID Violations***

15 s. Treated, stored, disposed of, transported, and offered for transportation, Target
16 Waste without having received and used a proper identification number from the U.S.
17 Environmental Protection Agency or DTSC for the originating facility, in violation of Title 22,
18 section 66262.12, subdivision (a).³

19 **FIRST CAUSE OF ACTION**

20 **(Disposal of Hazardous Waste at a Point Not Authorized)**
21 **(Health & Safety Code §§ 25203, 25189, subd. (c)-(d), 25189.2, subd. (c))**

22 23. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraph (a),
23 inclusive.

24 24. Health and Safety Code section 25203 prohibits the disposal of hazardous waste at
25 an unauthorized point.

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27
28 ³ Effective July 1, 2024, Section 66262.12 was repealed and replaced by Section
66262.18. References herein to Section 66262.12 include Section 66262.18, as applicable.

1 25. Defendant disposed or caused the disposal of Target Waste, in violation of Health
2 and Safety Code section 25203, and unless enjoined by order of the Court, Defendant may or will
3 continue in the course of conduct as alleged herein.

4 26. Pursuant to Health and Safety Code section 25189, subdivisions (c) and (d),
5 Defendant is liable for civil penalties according to proof for intentional or negligent violations. In
6 the alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
7 and Safety Code section 25189.2, subdivision (c). Health and Safety Code sections 25189 and
8 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
9 continuing violations, for each day that the violations continue.

10 27. Based on the above, Plaintiff also requests injunctive relief against Defendant
11 under Health and Safety Code section 25181.

12 SECOND CAUSE OF ACTION

13 (Violations of Hazardous Waste Determination Requirement) 14 (Health & Safety Code, §§ 25100 et seq., 25189, subd. (b), 25189.2, subd. (b); 15 Cal. Code Regs., tit. 22, §§ 66262.11, 66260.200, subd. (c))

16 28. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraph (b),
17 inclusive.

18 29. Title 22, sections 66262.11 and 66260.200, subdivision (c), require that a person
19 who generates a waste determine if that waste is hazardous using the methods proscribed in the
20 regulation.

21 30. Defendant failed to determine if the Target Waste it generated through its
22 operations and managed at Defendant's Covered Facilities is hazardous, in violation of the
23 hazardous waste determination requirement of Title 22, sections 66262.11 and 66260.200,
24 subdivision (c), and unless enjoined by order of the Court, Defendant may or will continue in the
25 course of conduct as alleged herein.

26 31. Pursuant to Health and Safety Code section 25189, subdivision (b), Defendant is
27 liable for civil penalties according to proof for intentional or negligent violations. In the
28 alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
and Safety Code section 25189.2, subdivision (b). Health and Safety Code sections 25189 and

1 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
2 continuing violations, for each day that the violations continue.

3 32. Based on the above, Plaintiff also requests injunctive relief against Defendant
4 under Health and Safety Code section 25181.

5 **THIRD CAUSE OF ACTION**
6 **(Violations of Hazardous Waste Storage and Accumulation Time Limit Requirements)**
7 **(Health & Safety Code, § 25123, subd. (h), 25189, subd. (b), (e), 25189.2, subd. (b), (d);**
8 **Cal. Code Regs., tit. 22, § 66262.34)**

9 33. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraph (c),
10 inclusive.

11 34. Health and Safety Code section 25123, subdivision (h) and Title 22, section
12 66262.34 prohibit the storage of hazardous waste onsite without a hazardous waste storage permit
13 from DTSC beyond the time permitted by law.

14 35. Defendant violated the foregoing hazardous waste storage and accumulation time
15 limits of the HWCL, including Title 22, with regard to the Target Waste at Defendant's Covered
16 Facilities, and unless enjoined by order of the Court, Defendant may or will continue in the
17 course of conduct as alleged herein.

18 36. Pursuant to Health and Safety Code section 25189, subdivisions (b) and (e),
19 Defendant is liable for civil penalties according to proof for intentional or negligent violations. In
20 the alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
21 and Safety Code section 25189.2, subdivisions (b) and (d). Health and Safety Code sections
22 25189 and 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
23 continuing violations, for each day that the violations continue.

24 37. Based on the above, Plaintiff also requests injunctive relief against Defendant
25 under Health and Safety Code section 25181.

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1 **FOURTH CAUSE OF ACTION**

2 **(Violations of Hazardous Waste Labeling and Container Requirements)**
3 **(Health & Safety Code, §§ 25201.15 25189, subd. (b), 25189.2, subd. (b);**
4 **Cal. Code Regs., tit. 22, § 66262.34, subd. (f), 66265.173)**

5 38. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraphs (d)-
6 (f), inclusive.

7 39. Title 22, section 66262.34, subdivision (f), requires containers of accumulated
8 Target Waste to be labeled as specified in the regulation. Section 66265.173 requires containers
9 holding hazardous waste to be maintained such that they are capable of being closed while in
10 storage. Health and Safety Code section 25201.15 requires hazardous waste aerosol cans to be
11 properly managed, stored, marked, and stored.

12 40. Defendant violated the foregoing labeling and container requirements of the
13 HWCL, including Title 22, with regard to the Target Waste at Defendant's Covered Facilities,
14 and unless enjoined by order of the Court, Defendant may or will continue in the course of
15 conduct as alleged herein.

16 41. Pursuant to Health and Safety Code section 25189, subdivision (b), Defendant is
17 liable for civil penalties according to proof for intentional or negligent violations. In the
18 alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
19 and Safety Code section 25189.2, subdivision (b). Health and Safety Code sections 25189 and
20 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
21 continuing violations, for each day that the violations continue.

22 42. Based on the above, Plaintiff also requests injunctive relief against Defendant
23 under Health and Safety Code section 25181.

24 **FIFTH CAUSE OF ACTION**

25 **(Violations of Hazardous Waste Transportation and Manifest Requirements)**
26 **(Health & Safety Code, §§ 25163, 25189, subd. (b), 25189.2, subd. (b);**
27 **Cal. Code Regs., tit. 22, § 66263.23)**

28 43. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraphs (g)-
(j), inclusive.

1 hazardous waste. Title 22, section 66273.36 requires that universal waste handlers provide
2 annual training pertaining to the management of universal waste to all personnel who manage
3 universal waste and maintain training documentation as specified in section 66273.36.

4 50. Through its operations, Defendant generates Target Waste, including universal
5 waste, at Defendant's Covered Facilities and failed to train field technicians and other employees
6 who handle that Target Waste, in violation of the training requirements of Title 22, sections
7 66265.16 and 66273.36, and unless enjoined by order of the Court, Defendant may or will
8 continue in the course of conduct as alleged herein.

9 51. Pursuant to Health and Safety Code section 25189, subdivision (b), Defendant is
10 liable for civil penalties according to proof for intentional or negligent violations. In the
11 alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
12 and Safety Code section 25189.2, subdivision (b). Health and Safety Code sections 25189 and
13 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
14 continuing violations, for each day that the violations continue.

15 52. Based on the above, Plaintiff also requests injunctive relief against Defendant
16 under Health and Safety Code section 25181.

17 **SEVENTH CAUSE OF ACTION**
18 **(Violations of Universal Waste Disposal, Management, Labeling, Marking, Accumulation**
19 **Time Limits, Sending and Tracking Requirements)**
20 **(Health & Safety Code, §§ 25100, et seq., 25189, subd. (b), 25189.2, subd. (b);**
21 **Cal. Code Regs., tit. 22, §§ 66273.1 et seq.)**

22 53. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraphs (l)-
23 (q), inclusive.

24 54. Defendant violated the universal waste disposal, management, labeling, marking,
25 accumulation time limits, sending and tracking requirements of the HWCL, including Title 22,
26 with regard to the Target Waste that constitutes universal waste at Defendant's Covered
27 Facilities, and unless enjoined by order of the Court, Defendant may or will continue in the
28 course of conduct as alleged herein.

1 55. Pursuant to Health and Safety Code section 25189, subdivision (b), Defendant is
2 liable for civil penalties according to proof for intentional or negligent violations. In the
3 alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
4 and Safety Code section 25189.2, subdivision (b). Health and Safety Code sections 25189 and
5 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
6 continuing violations, for each day that the violations continue.

7 56. Based on the above, Plaintiff also requests injunctive relief against Defendant
8 under Health and Safety Code section 25181.

9 **EIGHTH CAUSE OF ACTION**
10 **(Violations of Hazardous Waste Generator Identification Requirements)**
11 **(Health & Safety Code, §§ 25100, et seq., 25189, subd. (b), 25189.2, subd. (b);**
12 **Cal. Code Regs., tit. 22, § 66262.12(a))**

12 57. Plaintiff realleges paragraphs 1 through 21, and paragraph 22, subparagraph (s)
13 inclusive.

14 58. Defendant violated Title 22, section 66262.12 by failing to receive and use a
15 proper identification number from the U.S. Environmental Protection Agency or DTSC for the
16 originating facility when Defendant treated, stored, disposed of, transported, and offered for
17 transportation Target Waste, and unless enjoined by order of the Court, Defendant may or will
18 continue in the course of conduct as alleged herein.

19 59. Pursuant to Health and Safety Code section 25189, subdivision (b), Defendant is
20 liable for civil penalties according to proof for intentional or negligent violations. In the
21 alternative, Defendant is strictly liable for civil penalties according to proof pursuant to Health
22 and Safety Code section 25189.2, subdivision (b). Health and Safety Code sections 25189 and
23 25189.2 authorize the Court to impose civil penalties for each separate violation or, for
24 continuing violations, for each day that the violations continue.

25 60. Based on the above, Plaintiff also requests injunctive relief against Defendant
26 under Health and Safety Code section 25181.

1 **NINTH CAUSE OF ACTION**
2 **(Violations of Unfair Competition Law)**
3 **(Bus. & Prof. Code, §§ 17200 - 17208)**

4 61. Plaintiff realleges paragraphs 1 through 60, inclusive.

5 62. Defendant has engaged in and continues to engage in, has aided and abetted and
6 continues to aid and abet, and has conspired to and continues to conspire to engage in unlawful,
7 unfair or fraudulent acts or practices that constitute unfair competition as defined in Business and
8 Professions Code section 17200. These acts or practices include, but are not limited to, the
9 statutory and regulatory violations alleged in paragraph 22 above, and in the First through Eighth
10 Causes of Action.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff prays for the following relief as to Defendant:

- 13 1. A permanent injunction requiring Defendant to comply with those provisions of
14 the HWCL, which Defendant is alleged to have violated as set forth in this Complaint;
- 15 2. Such orders or judgments as may be necessary to prevent the use or employment
16 by Defendant of any practice that constitutes unfair competition or false advertising, under the
17 authority of Business and Professions Code section 17203;
- 18 3. Civil penalties against Defendant pursuant to Health and Safety Code section
19 25189, subdivisions (b), (c), (d), and (e) in an amount according to proof.
- 20 4. Civil penalties against Defendant pursuant to Health and Safety Code section
21 25189.2, subdivisions (b), (c), and (d) in an amount according to proof;
- 22 5. Civil penalties against Defendant, pursuant to Business and Professions Code
23 section 17206, of \$2,500.00 for each violation of unfair competition laws engaged in by
24 Defendant, in an amount according to proof;
- 25 6. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit
26 herein, including but not limited to such attorneys' fees and costs as are authorized to be
27 recovered pursuant to Code of Civil Procedure section 1021.8; and
- 28 7. Such other and further relief as the Court deems just and proper.

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Dated: December 4, 2024

Respectfully Submitted,

ROB BONTA
Attorney General of California
DENNIS L. BECK, JR.
Acting Senior Assistant Attorney General

KATE M. HAMMOND
TAYLOR G. RHODES
Deputy Attorneys General
*Attorneys for Plaintiff, the People of the
State of California*

Dated: December 4, 2024

PAMELA Y. PRICE
District Attorney of the County of Alameda

CARLOS J. E. GUZMAN
Deputy District Attorney
*Attorneys for Plaintiff, the People of the
State of California*

Dated: 12/21, 2024

STEPHEN M. WAGSTAFFE
District Attorney of the County of San
Mateo

Kenneth Mifsud
Deputy District Attorney in Charge
*Attorneys for Plaintiff, the People of the
State of California*

PRE-FILING VERSION

EXHIBIT A

EXHIBIT A
People v. Frontier California, Inc.

Facility No.	City	Address	State	Zip
1	Arcadia	11631/11633 CLARK ST	CA	91006
2	Barstow	135 COZY LANE	CA	92311
3	Big Bear	135 W Sherwood Blvd	CA	92314
4	Camarillo	201 Flynn Rd	CA	93012
5	Chatsworth	21230 Lassen St	CA	91311
6	Downey	9637 Imperial Hwy	CA	90242
7	Elk Grove	9260 E Stockton Blvd	CA	95624
8	Exeter	200 E Firebaugh Ave	CA	93221
9	Garberville	485 Conger St	CA	95542
10	Goleta	424 Patterson Ave	CA	93111
11	Hemet	331 E Menlo Ave	CA	92543
12	Huntington Beach	7242 Slater Ave	CA	92647
13	Indio	83793 Dr Carreon Blvd	CA	92201
14	La Puente	15356 E Nelson Ave	CA	91744
15	Lakewood	3770 Industry Ave	CA	90712
16	Lancaster	45243 N Beech Ave	CA	93534
17	Lompoc	150 Burton Mesa Blvd	CA	93436
18	Los Angeles	1450 S Bundy Drive	CA	90025
19	Los Angeles	5546 Westlawn Ave	CA	90066
20	Los Gatos	201 Camellia Terrace	CA	95030
21	Los Gatos	15 Montebello Way	CA	95030
22	Manteca	17855 Comconex Rd	CA	95336
23	Menifee	32477 Haun Rd	CA	92584
24	Mentone	1960 Mentone Blvd	CA	92359
25	Moreno Valley	22384 Alessandro Blvd	CA	92553
26	Morgan Hill	16280 Church St	CA	95037
27	Pico Rivera	9317 Washington Blvd	CA	90660
28	Pomona	1400 E Phillips Blvd	CA	91766
29	Rancho Mirage	35625 Duval Dr.	CA	91342
30	San Bernardino	1796 N I St	CA	92405
31	San Fernando	605 8th Street	CA	91340
32	Santa Fe Springs	13155 Alondra Blvd	CA	90670
33	Santa Maria	1223 W Fairway Dr	CA	93455
34	Santa Monica	2001 Broadway	CA	90404
35	Seal Beach	2400 N Gate Rd	CA	90740
36	Solvang	1926 Old Mission Dr	CA	93463
37	Torrance	2545 208th Street	CA	90501
38	Upland	234 W. Foothill Blvd.	CA	91786
39	Van Nuys	14635 Keswick St	CA	91405
40	Victorville	14938 La Paz Dr.	CA	92395

EXHIBIT A
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41	Victorville	16461 Mojave Dr	CA	92395
42	Weaverville	115 Bremmer St	CA	96093
43	Whittier	11024 First Ave	CA	90603
44	Yucca Valley	57186 Yucca Trail	CA	92284
45	Big Bear Lake	560 Bartlett Rd	CA	92315
46	Bloomington	18850 Orange St	CA	92316
47	Dos Palos	1823 Marguerite St	CA	93620
48	Hayward	21350 Cabot Blvd	CA	94545
49	Irvine	17642 Armstrong Ave	CA	92614
50	Lakewood	3771 Industry Ave	CA	90712
51	Los Angeles	1544 Cotner Ave	CA	90025
52	Los Angeles	800 S. Hope St	CA	90017
53	Ontario	1495 Auto Center Dr	CA	91761
54	Palm Springs	950 Williams St	CA	92264
55	Reedley	1625 E Dinuba Ave	CA	93654
56	Rimforest	Pine Ave at Blackfoot Ter	CA	92378
57	San Diego	8806 Complex Dr	CA	92123
58	San Joaquin	21925 Nevada St	CA	93660
59	Santa Monica	2500 Michigan Ave	CA	90404
60	Sherman Oaks	15303 Ventura Blvd	CA	91406
61	Twentynine Palms	73743 Amboy Rd	CA	91040
62	Victorville	14041 Mojave	CA	92395
63	West Sacramento	2820 Kovr Drive	CA	95605
64	San Fernando	510 Park Ave	CA	91340
65	Santa Fe Springs	12905 E Los Nietos Rd	CA	90670
66	Victorville	16071 La Paz Drive	CA	92395
67	Victorville	16071 Mojave Dr.	CA	92395
68	Novato	501 Davidson Ave	CA	94945
69	Taft	601 Gardner Field Rd	CA	93268
70	Bishop	385 S. Fowler St	CA	93514
71	Irwindale	5010 Azusa Canyon Rd	CA	91706
72	Rancho Cucamonga	9000 Hellman Ave	CA	91730
73	Redondo Beach	2819 W 182nd St	CA	90504