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TO GOVERNMENT  
CODE SECTION 6103

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN JOAQUIN

**THE PEOPLE OF THE STATE OF CALIFORNIA,**  
  
Plaintiff,  
  
v.  
  
**KAISER FOUNDATION HEALTH PLAN, INC., a California public benefit corporation; KAISER FOUNDATION HOSPITALS, a California public benefit corporation; and DOES 1 through 25,**  
  
Defendants.

STK-CV-UBT-2023-9608

**COMPLAINT FOR INJUNCTIVE RELIEF, CIVIL PENALTIES, AND OTHER RELIEF**

(Health & Saf. Code §§ 1280.15 1280.18, 25100 et seq., 117600 et seq.; Civil Code §§ 56 et seq., 1798.81; Bus. & Prof. Code, §17200 et seq.; Gov. Code, § 12607)

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1 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA (“Plaintiff” or “the People”),  
2 alleges on information and belief the following:

3 **PLAINTIFF**

4 1. The People are represented in this action by and through Rob Bonta, the Attorney  
5 General of the State of California; Pamela Price, the District Attorney of Alameda County; Jason  
6 Anderson, the District Attorney of San Bernardino County; Ronald J. Freitas, the District  
7 Attorney of San Joaquin County; Brooke Jenkins, the District Attorney of San Francisco; Stephen  
8 M. Wagstaffe, the District Attorney of San Mateo County; and Jeff W. Reisig, the District  
9 Attorney of Yolo County.

10 2. Under Government Code section 12511, the Attorney General has charge of all legal  
11 matters in which the State is involved. The Attorney General also has the express power to protect  
12 the environment and natural resources of the State of California pursuant to Government Code  
13 section 12600. Pursuant to Government Code section 12607, the Attorney General may maintain  
14 an action for equitable relief in the name of the people of the State of California against any  
15 person for the protection of the natural resources of the state from pollution, impairment, or  
16 destruction.

17 3. Pursuant to California Health and Safety Code sections 25145.4 and 25182, the  
18 Attorney General, together with the District Attorneys named above, may bring a civil action in  
19 the name of the People of the State of California to enjoin any violation of chapter 6.5 of Division  
20 20 of the California Health and Safety Code (“Chapter 6.5”), and to seek civil penalties for  
21 violations thereof.

22 4. Pursuant to California Health and Safety Code section 118325, the District Attorneys  
23 named above, may bring a civil action in the name of the People of the State of California to  
24 enjoin any violation of Part 14 of Division 104 of the California Health and Safety Code and to  
25 seek civil penalties for violations thereof.

26 5. Pursuant to California Business and Professions Code sections 17203, 17204 and  
27 17206, the Attorney General and the District Attorneys named above may bring a civil action in  
28 the name of the People of the State of California to enjoin any person who engages, has engaged,

1 or proposes to engage in unfair competition, as defined in California Business and Professions  
2 Code section 17200, and for civil penalties for each violation of Business and Professions Code  
3 section 17200 et seq.

4 6. The People bring this action without prejudice to any other actions or claims which  
5 the People may have based upon separate, independent and unrelated violations arising out of  
6 matters or allegations that are not set forth in this Complaint.

#### 7 **DEFENDANTS**

8 7. Defendant KAISER FOUNDATION HEALTH PLAN, INC., is now, and at all times  
9 mentioned in this Complaint was, a California public benefit corporation. Defendant KAISER  
10 FOUNDATION HOSPITALS, is now, and at all times mentioned in this Complaint was, a  
11 California public benefit corporation. Defendants KAISER FOUNDATION HEALTH PLAN,  
12 INC., and KAISER FOUNDATION HOSPITALS, hereinafter “Defendants,” provide managed  
13 healthcare and healthcare-related services to patients and consumers in the State of California.  
14 Defendants currently conduct and have conducted business at more than 800 facilities in  
15 California, including over 500 hospitals and medical office buildings. Defendants generate and  
16 manage waste streams at these facilities, including medical waste, hazardous waste, and universal  
17 waste, and also generate, manage, and/or dispose of documents and other items containing  
18 protected health information (“PHI”) of their patients.

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

24 9. Defendants are, and at all times relevant to the claims in this Complaint were, legally  
25 responsible for compliance with state and federal laws and regulations governing the disposition  
26 of the waste streams described above. These laws include:

- 27 • the Hazardous Waste Control Law set forth in Chapter 6.5 of Division 20 of the  
28 Health and Safety Code;

- 1 • the Medical Waste Management Act, set forth in Part 14 of Division 104 of the
- 2 California Health and Safety Code;
- 3 • the Confidentiality of Medical Information Act, set forth in California Civil Code
- 4 section 56 et seq.;
- 5 • the Customer Records Law, set forth in California Civil Code section 1798.80 et
- 6 seq.;
- 7 • Health and Safety Code sections 1280.15 and 1280.18;
- 8 • the Health Insurance Portability and Accountability Act of 1996, Pub. L. No.
- 9 104-191, 110 Stat. 1936, as amended by the Health Information Technology for
- 10 Economic and Clinical Health Act, Pub. L. No. 111-5, 123 Stat. 226; and
- 11 • the Unfair Competition Law, set forth in Business and Professions Code section
- 12 17200 et seq.

13 10. Defendants are “persons” as defined in California Health and Safety Code section  
14 25118.

15 **JURISDICTION AND VENUE**

16 11. Venue is proper in this county pursuant to California Health and Safety Code sections  
17 25183 and 118325, Civil Code section 56.36, subdivision (f), and Business and Professions Code  
18 section 17203, among other statutes, in that the violations alleged in this Complaint occurred in  
19 the County of San Joaquin and throughout the State of California. This court has jurisdiction  
20 pursuant to Article 6, section 10 of the California Constitution and section 393 of the Code of  
21 Civil Procedure.

22 12. The People and Defendants have entered into a series of agreements to toll any  
23 applicable statutes of limitation. As a result of those agreements, the period between February 1,  
24 2017, and the date of the filing of the Complaint, inclusive, is not to be included in computing the  
25 time limited by any statutes of limitation applicable to the causes of action brought against  
26 Defendants based on claims covered by the tolling agreements. Those claims include the claims  
27 alleged in this action against Defendants.

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1 **STATUTORY AND REGULATORY BACKGROUND**

2 13. **Hazardous Waste:** The State of California has enacted a comprehensive statutory  
3 and regulatory framework governing the generation, handling, treatment, storage, transportation,  
4 and disposal of hazardous waste known as the Hazardous Waste Control Law (“HWCL”). The  
5 HWCL, which is set forth in Division 20, Chapter 6.5 of the California Health and Safety Code  
6 and its implementing regulations, mandates a “cradle to grave” system to record the generation,  
7 registration, tracking, storage, treatment, and disposal of hazardous waste and to provide for the  
8 protection of the public and the environment from the potential risks posed by hazardous waste.

9 14. **Medical Waste:** The State of California also has enacted a comprehensive statutory  
10 framework to govern the management of medical waste. This framework is known as the  
11 Medical Waste Management Act (“MWMA”). The MWMA, which is set forth in Division 104,  
12 Part 14 of the Health and Safety Code (Health & Saf. Code, § 117600 et seq.), serves to protect  
13 the public and the environment and to limit exposure to pathological medical waste, specimens or  
14 tissues, objects containing or contaminated with human blood or bodily fluid, unusable medical  
15 products, expired medications, drugs and vaccines, sharps waste (i.e., needles and syringes), and  
16 other potentially infectious disease-causing agents and hazards. (Health & Saf. Code, § 117690,  
17 subd. (a).)

18 15. **Protected Health Information:** The medical and personal identifying information of  
19 healthcare patients (protected health information or “PHI”) are protected by various statutes and  
20 the regulations promulgated thereunder. These include:

- 21 • the Confidentiality of Medical Information Act (“CMIA”), codified at Civil Code  
22 section 56 et seq., a comprehensive statutory framework that governs the  
23 management of medical information;
- 24 • the Customer Records Law (“CRL”), Civil Code section 1798.81, which protects  
25 records containing personal information and requires businesses to make such  
26 records unreadable or undecipherable prior to disposal;

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- 1 • Health and Safety Code sections 1280.15 and 1280.18, which require healthcare  
2 facilities to safeguard and prevent the unauthorized access of patient medical  
3 information; and
- 4 • the Health Insurance Portability and Accountability Act of 1996, Pub. L. No.  
5 104-191, 110 Stat. 1938, as amended by the Health Information Technology for  
6 Economic and Clinical Health Act, Pub. L. No. 111-5, 123 Stat. 226, as well as  
7 the Department of Health and Human Services Regulations, 45 C.F.R. §§ 160 et  
8 seq. (collectively “HIPAA”), which sets forth requirements for the proper  
9 security and disposal of patient records containing confidential protected health  
10 information.

11 16. **Unfair Competition:** The Unfair Competition Law (UCL”), Business and  
12 Professions Code section 17200 et seq., prohibits any unlawful, unfair, or fraudulent business act  
13 or practice, including but not limited to violations of any of the laws set forth above. The  
14 violation of any law -- whether state or federal, statutory or regulatory – constitutes a violation of  
15 the UCL and subjects the violator to equitable relief, including an injunction, civil penalties and  
16 restitution, as applicable.

### 17 **ENFORCEMENT AUTHORITY**

18 17. The People’s authority to petition for relief from this Court derives from multiple  
19 sources. Section 25189 of the Health and Safety Code provides for civil liability for any negligent  
20 or intentional violation of the HWCL, or for any violation of any permit, rule, regulation,  
21 standard, or requirement issued or promulgated pursuant to the HWCL. Section 25189.2 of the  
22 Health and Safety Code is an alternative strict liability provision, which provides for civil liability  
23 for any violation of the HWCL, or for any violation of any permit, rule, regulation, standard, or  
24 requirement issued or promulgated pursuant to the HWCL.

25 18. The HWCL also authorizes the Court to enjoin any ongoing or potential violation of  
26 the HWCL or any applicable rule, regulation, permit, standard, requirement, or order issued or  
27 promulgated pursuant to the HWCL. (See Health & Saf. Code, §§ 25182, 25145.4, 25181 and  
28 25184.)

1 19. The MWMA authorizes an enforcement agency, including a district attorney, to bring  
2 an action to enjoin any violation of threatened violation of the law or the regulations promulgated  
3 thereunder. (See Health & Saf. Code, § 118325.)

4 20. The CMIA authorizes the attorney general or a district attorney to bring an action in  
5 the name of the People to obtain civil penalties for any violation of the Act. (Civ. Code, § 56.36,  
6 subd. (f)(1).)

7 21. The UCL authorizes the Attorney General or a district attorney to bring a civil action  
8 in the name of the People against any person who engages in unfair competition, including any  
9 “unlawful...business act or practice.” (Bus. & Prof. Code, § 17204.) Business and Professions  
10 Code section 17203 authorizes the Court to issue an order that enjoins any person who engages,  
11 has engaged or proposes to engage in unfair competition. Under Business and Professions Code  
12 section 17205, the remedies or penalties provided by the UCL are cumulative to each other and to  
13 the remedies or penalties available under all other laws of this state.

#### 14 **GENERAL ALLEGATIONS**

15 22. The allegations in this Complaint relate solely to Defendants’ compliance with the  
16 HWCL, the MWMA, and, by operation of the UCL, the other statutes, listed above and in  
17 paragraph 30 below, including patient privacy laws. The allegations further pertain only to  
18 Defendants’ Covered Facilities in California, as more fully described in paragraph 24 below, and  
19 to the “TARGET WASTE” generated at those Covered Facilities, described and defined in  
20 paragraph 26 below. Nothing in this Complaint relates to or pertains to any existing or potential  
21 claims or causes of action arising out of Defendants’ ownership or operation of any non-Covered  
22 Facility in California. Such claims or causes of action, if any, are reserved by Plaintiff.

23 23. This Complaint has been filed within five years of the People discovering the HWCL  
24 violations alleged herein, plus any applicable tolling periods. The Complaint also has been filed  
25 within four years of the People discovering the MWMA violations alleged herein, plus any  
26 applicable tolling periods. The Complaint also has been filed within four years of the People  
27 discovering the UCL violations alleged herein, plus any applicable tolling periods.

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1           24. At all times relevant hereto and continuing from and after the date of filing of this  
2 Complaint, Defendants owned and/or operated, and continue to own and/or operate,  
3 approximately 832 Covered Facilities throughout California. The term “**Covered Facilities**” as  
4 used herein shall mean those facilities in California which are owned or operated by Defendants  
5 or were owned and/or operated for a portion of the period covered by this Complaint as listed on  
6 the attached **Exhibit A**.

7           25. Defendants collectively constitute California’s largest managed-care organization,  
8 providing healthcare services to approximately 9 million Californians. They employ over 17,000  
9 physicians in California and operate over 800 facilities around the State, including medical  
10 centers and hospitals, and medical office buildings.

11           26. In providing these services, Defendants, by and through the physicians, nurses,  
12 medical assistants, technicians, and administrative staff who worked at the Covered Facilities,  
13 generate and manage large volumes of waste items (hereinafter referred to as “**TARGET**  
14 **WASTE**”), including:

15           a.     **medical waste** within the meaning of Health and Safety Code section 117690,  
16 including: biohazardous waste (such as items containing liquid human blood, including without  
17 limitation, syringes, suction canisters, tubes, blood bags, vials, chucks, bandages, gauze pads and  
18 sponges, items contaminated with potentially infectious bodily fluids, and vials containing live or  
19 attenuated vaccines), pathology waste (such as human body parts removed during surgery, and  
20 specimens or tissues removed that are suspected of being contaminated with infectious agents),  
21 pharmaceutical wastes (such as non-empty drug vials, IV bags, tubing, and nebulizers, prefilled  
22 drug syringes, over-the-counter medications, eye drops, surgical and skin prep products, and  
23 medicated lotions, soaps, and other personal care products), sharps (such as needles, syringes,  
24 lancets, scalpels, scissors, IV catheters, and tweezers), and trace chemotherapeutic waste.

25           b.     **hazardous waste** within the meaning of Health and Safety Code sections  
26 25117 and 25124, and corresponding regulations set forth in title 22, California Code of  
27 Regulations, including: batteries (such as alkaline, lithium-ion, lead-acid, nickel-cadmium, and  
28 button cell batteries), electronic devices containing printed circuit boards (such as electronic

1 thermometers, portable electronic diagnostic and health monitoring devices, electronic  
2 communication devices, and computer peripheral devices), non-empty aerosol cans (such as foam  
3 hand sanitizers, air fresheners, surface cleaners, and compressed air dusters), hazardous waste  
4 pharmaceuticals (such as warfarin, epinephrine, nitroglycerin, mitomycin, lindane/selenium  
5 shampoos, insulin with m-cresol preservative, inhalers, silver creams, and gels containing  
6 alcohol), and liquids and semi-solids (such as isopropyl alcohol, hydrogen peroxide, povidone-  
7 iodine, chlorohexidine gluconate, and other skin disinfectant solutions, tincture of benzoin, hand  
8 sanitizer, hemocult developer, lab test solutions, cleaning solutions such as non-empty  
9 disinfecting wipe containers, bleach, floor cleaners, mouthwash containing alcohol or sodium  
10 benzoate, shampoos, body washes, hand soap, and toothpaste with sodium fluoride);

11 c. **PHI** including: patient charts with active and past medical history, diagnoses  
12 and prognoses, discharge and admittance paperwork, medical procedure schedules, lab results,  
13 and financial and healthcare insurance documents.

14 27. Defendants, at each of the Covered Facilities, generated TARGET WASTE that  
15 constituted hazardous waste during every ninety (90) day period at large quantity generator  
16 locations and during every one-hundred-eighty (180) day period at small quantity generator  
17 locations.

18 28. Defendants dispose of solid waste through municipal waste haulers to local landfills  
19 and waste transfer stations.

20 29. At all times relevant to this Complaint, Defendants are or were responsible for the  
21 operation of Defendants' Covered Facilities in California. At all times relevant to this Complaint,  
22 Defendants were aware of and did or do conduct, approve and/or control activities at the Covered  
23 Facilities related to hazardous waste management, medical waste management, and management  
24 of PHI. At all times relevant to this Complaint, Defendants' actions and/or omissions, as part of a  
25 continuing course of conduct, are or were the legal cause of the violations alleged herein, and  
26 Defendants reasonably could have taken action to prevent the unlawful actions and/or omissions.

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1           30. All times relevant hereto, Defendants caused and/or performed each of the following  
2 acts and/or omissions in violation of the HWCL, MWMA, and the UCL in the ownership and/or  
3 operation of their Covered Facilities:

4           ***Hazardous Waste Disposal***

5           a. Defendants disposed, or caused the disposal of, TARGET WASTE that constitutes  
6 hazardous waste at a point not authorized or permitted by law, in violation of Health and Safety  
7 Code sections 25203, 25189 and 25189.2;

8           ***Hazardous Waste Determination***

9           b. Defendants failed to determine if TARGET WASTE generated, accumulated, stored,  
10 transferred, treated, received, and/or otherwise managed at any Covered Facilities was “hazardous  
11 waste” as required by California Code of Regulations, title 22, section 66260.200;

12           c. Defendants failed to determine whether each item for disposal from a Covered  
13 Facility was a waste, and if so, whether it was a “hazardous waste,” as required by California  
14 Code of Regulations, title 22, section 66262.11.

15           ***Hazardous Waste Management (General)***

16           d. Defendants failed to manage TARGET WASTE that constitutes hazardous waste,  
17 generated at any Covered Facility, as required by Chapter 6.5 of Division 20 of the Health and  
18 Safety Code and its implementing regulations in the California Code of Regulations, title 22.

19           e. Defendants failed to manage and dispose of TARGET WASTE that constitutes  
20 universal waste, at (or from) any Covered Facility in compliance with all applicable requirements  
21 contained in California Code of Regulations, title 22, section 66273.1 et seq.

22           f. Defendants failed to comply with the recordkeeping requirements of California Code  
23 of Regulation, title 22, section 66262.40, subdivision (a) or, for items that may be lawfully  
24 managed as universal waste, failed to comply with California Code of Regulation, title 22, section  
25 66273.39.

26           g. Defendants failed to properly empty a container, manage a non-empty container, or  
27 an inner liner removed from a container, which previously held a hazardous material, including

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1 hazardous waste, at Covered Facilities, as required by California Code of Regulations, title 22,  
2 section 66261.7.

3 ***Hazardous Waste Management (Labeling and Storage)***

4 h. Defendants failed to properly mark, label, and store containers of TARGET WASTE  
5 that constitute hazardous waste at Covered Facilities and failed to maintain all written documents  
6 relating to TARGET WASTE that constitutes hazardous waste, as required by California Code of  
7 Regulations, title 22, section 66262.34 including, without limitation, failing to identify in writing,  
8 by composition, physical state, and approximate weight, all hazardous waste generated,  
9 accumulated, stored, transferred, treated, and/or otherwise managed at each of the Covered  
10 Facilities.

11 i. Defendants failed to store and label TARGET WASTE that constitutes universal  
12 waste, including waste items that are accumulated or stored for recycling, in accordance with  
13 California Code of Regulations, title 22, sections 66273.33-66273.35.

14 ***Hazardous Waste Management (Accumulation Time)***

15 j. Defendants failed to lawfully and timely dispose of all accumulated TARGET  
16 WASTE that constitutes hazardous waste, at each Covered Facility, as required by California  
17 Code of Regulations, title 22, section 66262.34.

18 ***Hazardous and Universal Waste Management (Transportation)***

19 k. Defendants failed to transport, transfer custody of, or caused to be transported in  
20 California, TARGET WASTE that constitutes hazardous waste, wherein the transporter was not  
21 properly licensed and registered to transport hazardous waste, as required by Health and Safety  
22 Code section 25163.

23 l. Defendants transported, or caused to be transported, TARGET WASTE that  
24 constitutes hazardous waste, to an unauthorized location in California, in violation of Health and  
25 Safety Code section 25189.5.

26 m. Defendants transported, or caused to be transported, TARGET WASTE that  
27 constitutes universal waste, to an unauthorized location in California, in violation of California  
28 Code of Regulations, title 22, sections 66273.50-66273.56.

1 n. Defendants failed to timely cause to be prepared and filed a hazardous waste manifest  
2 with the California Department of Toxic Substances Control (Department) for TARGET WASTE  
3 that constitutes hazardous waste, that was transported, or submitted for transportation, for offsite  
4 handling, treatment, storage, disposal, or any combination thereof, as required by Health and  
5 Safety Code section 25160, subdivision (b)(1) through (b)(3), and California Code of  
6 Regulations, title 22, section 66262.23.

7 o. Defendants failed to comply with the universal waste handler requirements set forth  
8 in California Code of Regulations, title 22, section 66273.1 et seq., at each Covered Facility at  
9 which Defendants generated TARGET WASTE that constitutes universal waste.

10 p. Defendants failed to manage at the Covered Facilities discarded or no longer usable  
11 “non-empty” (California Code of Regulations, title 22, section 66261.7) aerosol cans as either: (i)  
12 universal waste aerosol cans in compliance with all applicable requirements set forth in California  
13 Code of Regulations, title 22, section 66273.1, et seq.; or (ii) as hazardous waste aerosol cans, as  
14 required by Health and Safety Code section 25201.16.

15 q. Defendants failed to manage at the Covered Facilities discarded or no longer usable  
16 batteries as either: (i) hazardous waste, in compliance with Title 22, California Code of  
17 Regulations, or (ii) universal waste, compliance with all applicable requirements contained in  
18 California Code of Regulations, title 22, section 66273.1, et seq.

19 ***Hazardous Waste Training***

20 r. Defendants failed to comply with employee-training obligations, as set forth in  
21 California Code of Regulations, title 22, sections 66265.16 and 66265.56, pertaining to the  
22 management of TARGET WASTE that constitutes hazardous waste, as well as those employee-  
23 training obligations set forth in California Code of Regulations, title 22, section 66273.36  
24 (pertaining to the management of universal waste) for each Covered Facility.

25 ***Medical Waste Disposal***

26 s. Defendants caused the disposal of TARGET WASTE that constitutes medical waste,  
27 at a facility not permitted to receive such waste in violation of Health and Safety Code section  
28 118340, subdivision (b).

1 ***Medical Waste Management***

2 t. Defendants failed to implement and maintain a medical waste management plan for  
3 each Covered Facility that generates TARGET WASTE that constitutes medical waste, pursuant  
4 to Health and Safety Code sections 117710, 117935, 117943, 117960, and related regulations.

5 u. Defendants failed to separate TARGET WASTE that constitutes medical waste at the  
6 point of origin, as required by Health and Safety Code section 118275, subdivision (a).

7 v. Defendants failed to properly containerize and store TARGET WASTE that  
8 constitutes medical waste, as required by Health and Safety Code sections 118280 and 118285.

9 w. Defendants failed to ensure that TARGET WASTE that constitutes medical waste is  
10 treated prior to disposal as required by Health and Safety Code sections 118215, subdivision (a),  
11 118220, 118222, and 118225.

12 x. Defendants failed to manage TARGET WASTE that constitutes mixed waste, in  
13 accordance with Health and Safety Code section 117730.

14 ***Medical Waste Management – Transportation***

15 y. Defendants failed to transport TARGET WASTE that constitutes medical waste using  
16 a registered hazardous waste hauler as required by Health and Safety Code section 118025.

17 z. Defendants failed to transport TARGET WASTE that constitutes medical waste to a  
18 permitted medical waste treatment facility as required by Health and Safety Code section 118000,  
19 subdivision (a).

20 aa. Defendants failed to maintain individual medical waste treatment operating records  
21 at large quantity generator Covered Facilities, and if applicable, tracking documents for all  
22 untreated TARGET WASTE that constitutes medical waste that was shipped offsite for treatment,  
23 as required by Health and Safety Code section 117975.

24 bb. Defendants failed to maintain individual medical waste treatment operating records  
25 for small quantity generator Covered Facilities, and if applicable, tracking documents for all  
26 untreated TARGET WASTE that constitutes medical waste that was shipped offsite for treatment,  
27 as required by Health and Safety Code sections 117943 and 117945.

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1 ***Protected Health Information***

2 cc. Defendants failed to take reasonable steps to dispose, or arrange for the disposal, of  
3 TARGET WASTE that constitutes protected health information by (i) shredding, (ii) erasing, or  
4 (iii) otherwise modifying individually identifiable medical information to make it unreadable or  
5 undecipherable, pursuant to California Civil Code section 56.101.

6 dd. Defendants failed to prevent unlawful or unauthorized access to, and use or disclosure  
7 of, patients' medical information, as required by Health and Safety Code section 1280.15, and  
8 failed to establish and implement appropriate administrative, technical, and physical safeguards to  
9 protect the privacy of a patient's medical information and failed to reasonably safeguard  
10 confidential medical information from any unauthorized access or unlawful access, use, or  
11 disclosure, as required by Health and Safety Code section 1280.18, subdivision (a).

12 ee. Defendants failed to take all reasonable steps to dispose, or arrange for the disposal, of  
13 TARGET WASTE that constitutes customer records within their custody or control containing  
14 personal information when the records were no longer to be retained by (a) shredding, (b) erasing,  
15 or (c) otherwise modifying the personal information in those records to make it unreadable or  
16 undecipherable, as required by Civil Code section 1798.80 et seq.

17 ff. Defendants, a health plan and health care provider, are HIPAA covered entities that  
18 disclosed TARGET WASTE that constitutes protected health information in violation of 45  
19 C.F.R. § 164.502(a). Defendants have also failed to have appropriate administrative, technical,  
20 and physical safeguards to protect the privacy of protected health information in violation of 45  
21 C.F.R. § 164.530(c)(1).

22 **FIRST CAUSE OF ACTION**  
23 **(Disposal of Hazardous Waste at a Point Not Authorized)**  
24 **(Health & Saf. Code, § 25203)**

25 31. The People reallege all previous paragraphs.

26 32. Health and Safety Code section 25203 prohibits the disposal of hazardous waste at an  
27 unauthorized point.

28 33. From one or more Covered Facilities, Defendants disposed, or caused the unlawful  
disposal, of any TARGET WASTE that constitutes hazardous waste originating from the Facility

1 or Facilities at a point not authorized by law or permitted by the Department, in violation of  
2 Health and Safety Code section 25203, and, unless enjoined by order of the Court, the Defendants  
3 may or will continue in the course of conduct as alleged herein;

4 34. The People request injunctive relief against the Defendants, and each of them, under  
5 Health and Safety Code sections 25181 and 25184, and for each act of disposal alleged above,  
6 civil penalties against the Defendants, and each of them, under Health and Safety Code section  
7 25189, subdivision (c), for each intentional violation, or subdivision (d), for each negligent  
8 violation, or Health and Safety Code section 25189.2, subdivision (b), for each strict liability  
9 violation, as set forth in the People’s prayer for relief.

10 **SECOND CAUSE OF ACTION**  
11 **(Violations of Hazardous Waste Determination Requirement)**  
12 **(Health and Safety Code, §§ 25181 and 25189;**  
**Cal Code Regs., tit. 22, §§ 66262.11 and 66260.200, Subd. (c).)**

13 35. The People reallege all previous paragraphs.

14 36. At one or more Covered Facilities, Defendants failed to determine if the TARGET  
15 WASTE generated and managed through their operations was a hazardous waste by using  
16 generator knowledge or applying testing methods, in violation of the hazardous waste  
17 determination requirements of the HWCL, and its implementing regulations at Title 22, including  
18 California Code of Regulations, title 22, sections 66262.11 and 66260.200, subd. (c), and unless  
19 enjoined by order of the Court, Defendants may or will continue in the course of conduct as  
20 alleged herein.

21 37. The People request injunctive relief against Defendants, and each of them, under  
22 Health and Safety Code section 25181, and civil penalties against the Defendants, and each of  
23 them, under Health and Safety Code section 25189, subdivision (b), for each intentional violation,  
24 or subdivision (d), for each negligent violation, or Health and Safety Code section 25189.2,  
25 subdivision (b), for each strict liability violation, as set forth in the People’s prayer for relief.

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1 **THIRD CAUSE OF ACTION**  
2 **(Violations of Hazardous Waste Accumulation Requirements)**  
3 **(Cal. Code Regs., tit. 22, §§ 66262.34, subd. (f), 66265.173)**

4 38. The People reallege all previous paragraphs.

5 39. At one or more Covered Facilities, Defendants accumulated TARGET WASTE that  
6 constitutes hazardous waste on-site without complying with the requirements of California Code  
7 of Regulations, title 22, sections 66262.34, subdivision (f) and 66265.173, by failing to label  
8 containers as hazardous waste, failing to identify the name and address of the generator of the  
9 hazardous waste, failing to identify the physical and chemical characteristics of the hazardous  
10 waste, failing to identify the starting accumulation date, failing to identify in writing,  
11 composition, physical state, and approximate weight all hazardous waste generated, accumulated,  
12 stored, transferred, treated, and/or by failing to determine whether each Covered Facility is a large  
13 or small quantity generator, in violation of California Code of Regulations, title 22, section  
14 66262.34. Unless enjoined by order of the Court, the Defendants may or will continue in the  
15 course of conduct as alleged herein.

16 40. The People request injunctive relief against Defendants, and each of them, under  
17 Health and Safety Code section 25181, and civil penalties against Defendants, and each of them,  
18 under Health and Safety Code section 25189, subdivision (b), for each intentional or negligent  
19 violation, or civil penalties against the Defendants, and each of them, under Health and Safety  
20 Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in Plaintiff's  
21 prayer for relief.

22 **FOURTH CAUSE OF ACTION**  
23 **(Storage of Hazardous Wastes Without Authorization)**  
24 **(Health & Saf. Code, § 25123.3, subd. (h)(1);**  
25 **Cal. Code Regs., tit. 22, 66262.34)**

26 41. The People reallege all previous paragraphs.

27 42. Defendants, at one or more of the Covered Facilities, failed to maintain a program for  
28 the lawful storage, handling, and accumulation of TARGET WASTE that constitutes hazardous  
waste, and for the lawful segregation of hazardous waste items that are in leaking containers, in

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1 violation of Health & Safety Code section 25123.3, subdivision (d), and California Code of  
2 Regulations, title 22, sections 66262.34 and 66265.171-177.

3 43. At one or more Covered Facilities, Defendants, as a generator of less than 1,000  
4 kilograms of hazardous waste in any calendar month which accumulated hazardous waste onsite  
5 for more than one hundred eighty (180) days, violated Health and Safety Code section 25123.3,  
6 subdivision (h)(1) by failing to comply with the conditions set forth in therein. Further, at one or  
7 more Covered those Facilities, Defendants operated a storage facility without authorization by the  
8 Department. Unless enjoined by order of the Court, Defendants may or will continue in the course  
9 of conduct as alleged herein.

10 44. Plaintiff requests injunctive relief against Defendants, and each of them, under Health  
11 and Safety Code section 25181, and civil penalties against Defendants, and each of them, under  
12 Health and Safety Code section 25189, subdivision (e), for each intentional or negligent violation,  
13 or civil penalties against Defendants, and each of them, under Health and Safety Code section  
14 25189.2, subdivision (d), for each strict liability violation, as set forth in Plaintiff's prayer for  
15 relief.

16 **FIFTH CAUSE OF ACTION**  
17 **(Unauthorized Transportation of Hazardous Waste)**  
18 **(Health & Saf. Code, §§ 25163, 25189, 25189.2;**  
19 **Cal. Code Regs., tit. 22, § 66263.23)**

19 45. The People reallege all previous paragraphs.

20 46. At one or more Covered Facilities, Defendants transferred custody of TARGET  
21 WASTE that constitutes hazardous waste from the Facilit(ies) to transporters who did not have a  
22 valid registration from the Department to transport hazardous waste, in violation of Health and  
23 Safety Code section 25163, subdivision (a)(1). At one or more Covered Facilities, the Defendants  
24 placed TARGET WASTE that constitutes hazardous waste in trash containers at the Facility or  
25 Facilities and then transported, or caused to be transported, the contents of such trash containers  
26 off-site to locations not permitted or otherwise authorized by the Department to receive the waste,  
27 including to municipal landfills, in violation of Health and Safety Code section 25189.5, 25163

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1 and California Code of Regulations, title 22, section 66263.23. Unless enjoined by order of the  
2 Court, Defendants may or will continue in the course of conduct as alleged herein.

3 47. Based on the above, the People request injunctive relief against Defendants under  
4 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section  
5 25189 or 25189.2, as described in the People's prayer for relief.

6 **SIXTH CAUSE OF ACTION**  
7 **(Violations of Requirement To Submit Manifests to the Department)**  
8 **(Health & Saf. Code, § 25160;**  
9 **Cal. Code Regs., tit. 22, §§ 66262.20, 66262.23, subd. (a)(4))**

9 48. The People reallege all previous paragraphs.

10 49. At one or more Covered Facilities, the Defendants violated Health & Safety Code  
11 section 25160, subdivision (b)(1)-(3), and California Code of Regulation, title 22, section  
12 66262.23 by: failing to timely prepare and file with the Department hazardous waste manifest(s)  
13 for all TARGET WASTE that constitutes hazardous waste, that was transported, or submitted for  
14 transportation, for offsite handling, treatment, storage, disposal, or any combination thereof; by  
15 failing to submit to the Department within thirty (30) days of each shipment of hazardous waste,  
16 uniform hazardous waste manifests for hazardous wastes that were transported, or caused to be  
17 transported, for off-site handling, treatment, storage, disposal, or any combination thereof;  
18 California Code of Regulation, title 22, section 66262.20 by failing to prepare a uniform  
19 hazardous waste manifest for expired pharmaceuticals or non-RCRA hazardous waste; and  
20 California Code of Regulations, title 22, sections 66262.40 and 66273.39 by failing to maintain  
21 copies of hazardous waste manifests at the Covered Facilities for three (3) years and failing to  
22 keep a record of each shipment of universal waste at the Covered Facilities for three (3) years.

23 50. The People request injunctive relief against the Defendants, and each of them, under  
24 Health and Safety Code section 25181, and civil penalties against the Defendants, and each of  
25 them, under Health and Safety Code section 25189, subdivision (b), for each intentional or  
26 negligent violation, or civil penalties against the Defendants, and each of them, under Health and  
27 Safety Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in the  
28 People's prayer for relief.

1                                   **SEVENTH CAUSE OF ACTION**  
2                                   **(Violation of Hazardous Waste Handling and Storage Requirements)**  
3                                   **(Health & Saf. Code Chapter 6.5 (§ 25100 et seq.);**  
4                                   **Cal. Code Regs., tit. 22, § 66260.1 et seq.)**

5           51. The People reallege all previous paragraphs.

6           52. Health and Safety Code sections 25189 and 25189.2 prohibit improper hazardous  
7 waste handling and storage in violation of Chapter 6.5 of Division 20 of the Code.

8           53. With respect to Covered Facilities, Defendants violated the requirements of Chapter  
9 6.5 and its implementing regulations, to wit, California Code of Regulations, title 22, section  
10 66260.1 et seq., by failing to comply with employee training obligations pertaining to the  
11 management of TARGET WASTE that constitutes hazardous waste at the Covered Facilities, in  
12 violation of California Code of Regulations, sections 66265.16 and 66265.56, and failing to  
13 properly manage and label each individual container of hazardous waste as "Hazardous Waste,"  
14 and by failing to identify the accumulation start date, the composition and physical state of the  
15 waste, the properties of the waste, and the name and address of the generator at the Covered  
16 Facilities, in violation of California Code of Regulations, title 22, section 66262.34, subdivision  
17 (f). Unless enjoined by order of the Court, Defendants may or will continue committing these acts  
18 and omissions.

19           54. Based on the above, the People request injunctive relief against Defendants under  
20 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section  
21 25189 or 25189.2, as described in the People's prayer for relief.

22                                   **EIGHTH CAUSE OF ACTION**  
23                                   **(Disposal of Untreated Medical Waste)**  
24                                   **(Health & Saf. Code, §§ 118215, 118220, 118222, & 118225)**

25           55. The People reallege all previous paragraphs.

26           56. Health and Safety Code sections 118215, 118220, 118222, and 118225 prohibit the  
27 disposal of medical waste, including biohazardous waste, pathology waste, trace chemotherapy  
28 waste, pharmaceutical waste, and sharps waste, without first treating such waste by a method  
specified in the MWMA.

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1 57. At one or more Covered Facilities, Defendants disposed of TARGET WASTE that  
2 constitutes medical waste, originating from the Facility or Facilities without first properly treating  
3 it, in violation of California Health and Safety Code sections 118215, 118220, 118222, and  
4 118225. Unless enjoined by order of the Court, Defendants, and each of them, may or will  
5 continue in the course of conduct as alleged herein.

6 58. Based on the above, the People request injunctive relief against Defendants under  
7 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section  
8 118345, subdivision (b), as described in the People's prayer for relief.

9  
10 **NINTH CAUSE OF ACTION**  
**(Failure to Separate Medical Waste)**  
**(Health & Saf. Code, § 118275)**

11 59. The People reallege all previous paragraphs.

12 60. Health and Safety Code sections 118275 requires that medical waste be separated  
13 from other waste at the point of origin in the producing facility.

14 61. At one or more Covered Facilities, Defendants failed to separate TARGET WASTE  
15 that constitutes medical waste, originating from the producing Facility or Facilities from all other  
16 waste, a violation of California Health and Safety Code section 118275, subdivision (a). Unless  
17 enjoined by order of the Court, Defendants, and each of them, may or will continue in the course  
18 of conduct as alleged herein.

19 62. Based on the above, the People request injunctive relief against Defendants under  
20 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section  
21 118345, subdivision (b), as described in the People's prayer for relief.

22 **TENTH CAUSE OF ACTION**  
23 **(Failure to Containerize and Separately Store Medical Waste)**  
24 **(Health & Saf. Code, §118280)**

25 63. The People reallege all previous paragraphs.

26 64. Health and Safety Code section 118280 requires that medical waste be contained  
27 separately from other waste, including by using of sharps containers for sharps, labeling  
28 biohazard bags for biohazardous waste, labeling secondary containment and segregation of trace  
chemotherapy waste, labeling secondary containment and segregation of pathology waste,

1 labeling secondary containment and segregation of nonradioactive pharmaceutical waste, and  
2 labeling secondary containment and segregation of pharmaceutical waste classified as controlled  
3 substances by the United States Drug Enforcement Administration.

4 65. At one or more Covered Facilities, Defendants failed to containerize TARGET  
5 WASTE that constitutes medical waste, originating from the Facility or Facilities without first  
6 properly treating it, in violation of California Health and Safety Code sections 118275  
7 subdivision (a), and 118280, subdivisions (b) and (c). Unless enjoined by order of the Court,  
8 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

9 66. Based on the above, the People request injunctive relief against Defendants under  
10 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section  
11 118345, subdivision (b), as described in the People's prayer for relief.

12 **ELEVENTH CAUSE OF ACTION**  
13 **(Transportation of Medical Waste in a Manner Not Authorized)**  
14 **(Health & Saf. Code, § 118000 & 118025)**

14 67. The People reallege all previous paragraphs.

15 68. Health and Safety Code sections 118000 and 118025 requires that medical waste be  
16 transported by a registered hazardous waste hauler to a permitted medical waste treatment  
17 facility, or to a transfer station or another registered generator for the purpose of consolidation  
18 before treatment and disposal.

19 69. At one of more Covered Facilities, Defendants failed to transport TARGET WASTE  
20 that constitutes medical waste from the Facility or Facilities using a registered hazardous waste  
21 hauler, in violation of Health and Safety Code section 118025 and failed to transport medical  
22 waste from the Facility or Facilities to a permitted medical waste treatment facility, in violation of  
23 Health and Safety Code section 118000, subdivision (a). Unless enjoined by order of the Court,  
24 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

25 70. Based on the above, the People request injunctive relief against Defendants under  
26 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section  
27 118345, subdivision (b), as described in the People's prayer for relief.

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**TWELFTH CAUSE OF ACTION**  
**(Violations of Confidential Medical Information Act)**  
**(Civil Code, § 56 et seq.)**

71. The People reallege all previous paragraphs.

72. California Civil Code sections 56 et seq., prohibits the failure to maintain, preserve, store, destroy or dispose of medical information in a manner that preserves the confidentiality of the medical information.

73. As “providers of health care” and “healthcare service plans” (Civ. Code, § 56.05, subd. (f) and (o)), Defendants are obligated to preserve the confidentiality of medical information the create, maintain, preserve, store, abandon, destroy, or dispose.

74. Defendants have abandoned and disposed and continue to abandon and dispose of TARGET WASTE that constitutes medical information and records originating from their Covered Facilities without doing so in a manner which preserves the confidentiality of the information contained therein, in violation of California Civil Code section 56.101, subdivision (a). Unless enjoined by order of the Court, Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

75. Because of Defendants’ failures, Defendants negligently maintained, preserved, and stored TARGET WASTE that constitutes medical information in violation of Civil Code section 56.101, subdivision (a).

76. Defendants have also negligently disclosed medical information in violation of Civil Code section 56.36(c)(l). Each act of disposal of medical records without proper precautions subjects Defendants to a separate and additional civil penalty under Civil Code section 56.36, subdivision (c).

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**THIRTEENTH CAUSE OF ACTION**  
**(Violations of Unfair Competition Law)**  
**(Bus. & Prof. Code, § 17200 et seq.)**

83. The People reallege all previous paragraphs.

84. Defendants have engaged in, and continue to engage in, unlawful acts, omissions, and practices that constitute unfair competition within the meaning of Business and Professions Code sections 17200 through 17208, as alleged in the paragraphs above, including specifically the

1 statutory and regulatory violations alleged in paragraph 30 above, and in the First through  
2 Twelfth Causes of Action, with respect to TARGET WASTE at Covered Facilities. Unless  
3 enjoined by order of the Court, Defendants may or will continue in the course of conduct as  
4 alleged in this Complaint.

5 85. Each and every separate violation of law alleged herein constitutes an unlawful,  
6 fraudulent and/or unfair business practice and is a separate and distinct violation of Business and  
7 Professions Code section 17200 et seq.

### 8 PRAYER

9 WHEREFORE, Plaintiff prays for the following relief as to both Defendants:

10 1. A permanent injunction requiring Defendants to comply with those provisions of the  
11 Hazardous Waste Control Law (Division 20, Chapter 6.5 of the Health and Safety Code) and its  
12 implementing regulations which Defendants are alleged to have violated as set forth in this  
13 Complaint;

14 2. A permanent injunction requiring Defendants to comply with those provisions of the  
15 Medical Waste Management Act (Division 104, Part 14 of the Health and Safety Code) which  
16 Defendants are alleged to have violated as set forth in this Complaint;

17 3. A permanent injunction requiring Defendants to comply with those sections of the  
18 Confidentiality of Medical Information Act (Civil Code section 56 et seq.) which Defendants are  
19 alleged to have violated as set forth in this Complaint;

20 4. A permanent injunction, issued pursuant to Business and Professions Code section  
21 17203, prohibiting Defendants from engaging in acts or practices that violate any of the foregoing  
22 laws including: the Hazardous Waste Control Law (Division 20, Chapter 6.5 of the Health and  
23 Safety Code); the Medical Waste Management Act (Division 104, Part 14 of the Health and  
24 Safety Code); Health and Safety Code section 1280.18, subdivision (a); Health and Safety Code  
25 section 1280.15; Civil Code section 56 et seq., Civil Code section 1798.81, and the Health  
26 Insurance Portability and Accountability Act of 1996;

27 5. Civil penalties against Defendants pursuant to Health and Safety Code section 25189,  
28 subdivisions (b), (c), and (d), in an amount according to proof.



1           6.     Civil penalties against Defendants pursuant to Health and Safety Code section  
2 25189.2, subdivision (b), in an amount according to proof;

3           7.     Civil penalties against Defendants pursuant to Health & Safety Code section 117600  
4 et seq., in an amount according to proof (Health & Saf. Code, § 118345, subd. (b));

5           8.     Civil penalties against Defendants for each violation of Civil Code section 56.101, in  
6 an amount according to proof (Civ. Code, § 56.36, subd. (c)(l));

7           9.     Civil penalties against Defendants, pursuant to Business and Professions Code section  
8 17206, in an amount according to proof;

9           10.    Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit  
10 herein, including but not limited to such attorneys' fees and costs as are authorized to be  
11 recovered pursuant to Code of Civil Procedure section 1021.8; and

12           11.    Such other and further relief as the Court deems just and proper.

13  
14 Respectfully submitted,

15 Dated: September   5  , 2023

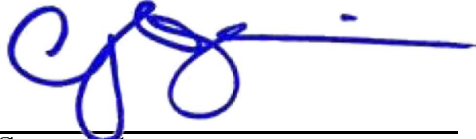
ROB BONTA  
Attorney General of California

16  
17  
18 *Edward H. Ochoa*

EDWARD H. OCHOA  
Senior Assistant Attorney General

19  
20  
21 Dated: September   5  , 2023

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DISTRICT ATTORNEY OF ALAMEDA COUNTY

22 

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DEPUTY DISTRICT ATTORNEY

1 Dated: September 6, 2023

JASON ANDERSON  
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STEPHANIE B. WEISSMAN  
Deputy District Attorney

2  
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4 Dated: September 6, 2023

RONALD J. FREITAS  
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CELESTE KAISCH  
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5  
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7  
8  
9  
10 Dated: September 5, 2023

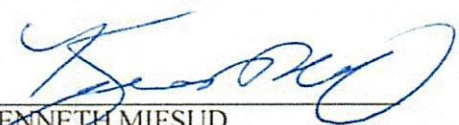
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12  
13  
14  
15 Dated: September 5, 2023

STEPHEN M. WAGSTAFFE  
District Attorney of San Mateo County



KENNETH MIFSUD  
Deputy District Attorney in Charge

16  
17  
18  
19  
20 Dated: September 6, 2023

JEFF W. REISIG  
District Attorney of Yolo County



DAVID J. REILY  
Assistant Chief Deputy District Attorney

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# Exhibit A

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
1	Alameda Medical Offices	Central Ave.	Alameda	Alameda
2	Alameda Medical Offices	Central Ave.	Alameda	Alameda
3	Alameda Human Resource Service Center	Harbor Bay Pkwy.	Alameda	Alameda
4	Berkeley Medical Offices	10 St	Berkeley	Alameda
5	Berkeley Campus	Eastshore Hwy.	Berkeley	Alameda
6	Berkeley Campus	Eastshore Hwy.	Berkeley	Alameda
7	Berkeley Campus	Eastshore Hwy.	Berkeley	Alameda
8	Berkeley Biomedical Engineering	Second St.	Berkeley	Alameda
9	Berkeley Campus	Second St.	Berkeley	Alameda
10	Berkeley Campus	Second St.	Berkeley	Alameda
11	Berkeley Campus	Second St.	Berkeley	Alameda
12	Dublin Land	Dublin Blvd.	Dublin	Alameda
13	Dublin Land	Dublin Blvd.	Dublin	Alameda
14	Fremont Medical Center	Boscell Rd.	Fremont	Alameda
15	Fremont Medical Center	Civic Center Dr., 3rd Fl.	Fremont	Alameda
16	Fremont Medical Center	Paseo Padre Pkwy	Fremont	Alameda
17	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
18	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
19	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
20	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
21	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
22	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
23	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
24	Fremont Medical Center	Paseo Padre Pkwy.	Fremont	Alameda
25	Hayward Medical Center	Hesperian Blvd.	Hayward	Alameda
26	Hayward Medical Center	Hesperian Blvd.	Hayward	Alameda
27	Hayward Medical Center	Hesperian Blvd.	Hayward	Alameda
28	Hayward Sky West Commons	Hesperian Blvd.	Hayward	Alameda
29	San Leandro Skilled Nursing	Mattox Rd.	Hayward	Alameda
30	Hayward Medical Center	Sleepy Hollow South	Hayward	Alameda
31	Sleepy Hollow Medical Offices	Sleepy Hollow South	Hayward	Alameda
32	Livermore Medical Offices	Las Positas Rd.	Livermore	Alameda
33	Livermore Distribution Center	Pullman St.	Livermore	Alameda
34	Livermore Distribution Center	Pullman St.	Livermore	Alameda
35	Livermore Distribution Center	Pullman St.	Livermore	Alameda
36	Livermore Distribution Center	Pullman St.	Livermore	Alameda
37	Regional - Oakland	19th	Oakland	Alameda
38	Division of Research - Oakland	Broadway	Oakland	Alameda
39	Oakland Medical Center	Broadway	Oakland	Alameda
40	Oakland Medical Center	Broadway	Oakland	Alameda
41	Oakland Medical Center	Broadway	Oakland	Alameda
42	Oakland Medical Center	Broadway	Oakland	Alameda
43	Oakland Medical Center	Broadway	Oakland	Alameda
44	Oakland Medical Center	Broadway	Oakland	Alameda
45	Oakland Medical Center	Broadway	Oakland	Alameda
46	Oakland Medical Center	Broadway	Oakland	Alameda
47	Oakland Medical Center	Broadway	Oakland	Alameda
48	Oakland Medical Center	Broadway	Oakland	Alameda
49	Oakland Medical Center	Broadway	Oakland	Alameda
50	Oakland Medical Center	Broadway	Oakland	Alameda
51	Oakland Medical Center	Broadway	Oakland	Alameda
52	Regional - Oakland	Broadway	Oakland	Alameda
53	Pharmacy Distribution Warehouse	Coliseum Way	Oakland	Alameda
54	Regional - Oakland	Franklin St.	Oakland	Alameda
55	Harrison	Harrison St.	Oakland	Alameda
56	Oakland Medical Center	Howe St.	Oakland	Alameda
57	Oakland Medical Center	Howe St.	Oakland	Alameda
58	Oakland Medical Center	Howe St.	Oakland	Alameda
59	Ordway	Lakeside Dr.	Oakland	Alameda
60	Oakland Medical Center	MacArthur Blvd., CPM Bldg. Ste. 117	Oakland	Alameda
61	Ordway	One Kaiser Plaza	Oakland	Alameda
62	Oakland Medical Center	Piedmont Ave.	Oakland	Alameda

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
63	Oakland Medical Center	Piedmont Ave.	Oakland	Alameda
64	Oakland Medical Center	Telegraph	Oakland	Alameda
65	Oakland Medical Center	W MacArthur Blvd	Oakland	Alameda
66	Oakland Medical Center	W. Macarthur Blvd.	Oakland	Alameda
67	Oakland Medical Center	W. Macarthur Blvd.	Oakland	Alameda
68	Oakland Medical Center	W. MacArthur Blvd.	Oakland	Alameda
69	Oakland Medical Center	Webster	Oakland	Alameda
70	Oakland Regional Support	Webster St.	Oakland	Alameda
71	Regional - Oakland	Webster St.	Oakland	Alameda
72	Pleasanton Medical Offices	Hacienda Dr., Bldg A	Pleasanton	Alameda
73	Pleasanton Medical Offices	Hacienda Dr., Bldg B	Pleasanton	Alameda
74	Pleasanton Medical Offices	Hacienda Dr., Bldg C	Pleasanton	Alameda
75	Pleasanton Medical Offices	Hacienda Dr., Bldg D	Pleasanton	Alameda
76	Pleasanton Medical Offices	Hopyard Rd., Ste. 140/270	Pleasanton	Alameda
77	Pleasanton Medical Offices	Owens Dr.	Pleasanton	Alameda
78	Pleasanton Medical Offices	Owens Dr.	Pleasanton	Alameda
79	Pleasanton Medical Offices	Owens Dr.	Pleasanton	Alameda
80	Pleasanton Medical Offices	Stoneridge Dr.	Pleasanton	Alameda
81	Pleasanton Medical Offices	Stoneridge Dr.	Pleasanton	Alameda
82	Pleasanton Medical Offices	Stoneridge Mall Rd.	Pleasanton	Alameda
83	San Leandro Skilled Nursing	168th Ave.	San Leandro	Alameda
84	San Leandro Skilled Nursing	168th Ave.	San Leandro	Alameda
85	San Leandro Skilled Nursing	168th Ave.	San Leandro	Alameda
86	San Leandro Skilled Nursing	168th Ave.	San Leandro	Alameda
87	San Leandro Medical Center	Merced St.	San Leandro	Alameda
88	San Leandro Medical Center	Fairway Dr.	San Leandro	Alameda
89	San Leandro Medical Center	Merced St.	San Leandro	Alameda
90	San Leandro Medical Center	Merced St.	San Leandro	Alameda
91	Ordway	Whitney St.	San Leandro	Alameda
92	Hayward Medical Center	Eigenbrodt Way	Union City	Alameda
93	Hayward Medical Center	Whipple Rd.	Union City	Alameda
94	Hayward Medical Center	Whipple Rd.	Union City	Alameda
95	Hayward Medical Center	Whipple Rd.	Union City	Alameda
96	Sacramento Medical Center	Sacramento	Sacramento	CA
97	Antioch Delta Fair Medical Offices	Delta Fair Blvd.	Antioch	Contra Costa
98	Antioch Delta Fair Medical Offices	Delta Fair Blvd.	Antioch	Contra Costa
99	Antioch Delta Fair Medical Offices	Delta Fair Blvd.	Antioch	Contra Costa
100	Antioch Delta Fair Medical Offices	Delta Fair Blvd.	Antioch	Contra Costa
101	Antioch Delta Fair Medical Offices	Delta Fair Blvd., Bldg. C	Antioch	Contra Costa
102	Antioch Delta Fair Medical Offices	Delta Fair Blvd., Bldg. E	Antioch	Contra Costa
103	Antioch Delta Fair Medical Offices	Hillcrest Ave.	Antioch	Contra Costa
104	Antioch Medical Center	Sand Creek Rd.	Antioch	Contra Costa
105	Antioch Medical Center	Sand Creek Rd.	Antioch	Contra Costa
106	Antioch Medical Center	Sand Creek Rd.	Antioch	Contra Costa
107	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
108	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
109	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
110	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
111	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
112	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
113	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
114	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
115	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
116	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
117	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
118	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
119	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
120	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
121	Martinez Medical Offices	Muir Rd.	Martinez	Contra Costa
122	Martinez Tiburon Regional	Roman Wy.	Martinez	Contra Costa
123	Pinole Vista Crossing	Fitzgerald Dr.	Pinole	Contra Costa
124	Pinole Medical Offices	Pinole Valley Rd.	Pinole	Contra Costa

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
125	Richmond Medical Center	Harbour Way	Richmond	Contra Costa
126	Richmond Medical Center	MacDonald	Richmond	Contra Costa
127	Marina Way South	Marina Way South	Richmond	Contra Costa
128	Marina Way South	Marina Way South	Richmond	Contra Costa
129	School of Allied Health Sciences	Marina Way South	Richmond	Contra Costa
130	Richmond Medical Center	Nevin Ave.	Richmond	Contra Costa
131	Richmond Medical Center	Nevin Ave.	Richmond	Contra Costa
132	Richmond Medical Center	Nevin Ave.	Richmond	Contra Costa
133	Richmond Medical Center	Nevin Ave.	Richmond	Contra Costa
134	Richmond Medical Center	Nevin Ave.	Richmond	Contra Costa
135	San Ramon Medical Offices	Camino Ramon	San Ramon	Contra Costa
136	Park Shadelands Medical Offices	Lennon Lane	Walnut Creek	Contra Costa
137	Park Shadelands Medical Offices	Lennon Lane	Walnut Creek	Contra Costa
138	Park Shadelands Medical Offices	Lennon Lane	Walnut Creek	Contra Costa
139	Walnut Creek - IT	Lennon Ln.	Walnut Creek	Contra Costa
140	Walnut Creek Medical Center	Lilac Dr.	Walnut Creek	Contra Costa
141	Walnut Creek Medical Center	Maria Ln., Ste. 150 & 300	Walnut Creek	Contra Costa
142	Walnut Creek Medical Center	Maria Ln., Ste. 250, 265, 270, 330 & 340	Walnut Creek	Contra Costa
143	Walnut Creek Medical Center	Maria Ln., Ste. 280, 310 & 350	Walnut Creek	Contra Costa
144	Walnut Creek Medical Center	Maria Ln., Ste. 340, 420 & 460	Walnut Creek	Contra Costa
145	Park Shadelands Medical Offices	Mitchell Dr.	Walnut Creek	Contra Costa
146	Park Shadelands Medical Offices	N. Wiget	Walnut Creek	Contra Costa
147	Walnut Creek Medical Center	Newell Ave.	Walnut Creek	Contra Costa
148	Walnut Creek Medical Center	Newell Ave.	Walnut Creek	Contra Costa
149	Walnut Creek Medical Center	Newell Ave.	Walnut Creek	Contra Costa
150	Walnut Creek Medical Center	Newell Ave.	Walnut Creek	Contra Costa
151	Walnut Creek Medical Center	Newell Ave.	Walnut Creek	Contra Costa
152	Walnut Creek Medical Center	Newell Ave.	Walnut Creek	Contra Costa
153	Walnut Creek Medical Center	S. Broadway	Walnut Creek	Contra Costa
154	Walnut Creek Medical Center	S. California Blvd.	Walnut Creek	Contra Costa
155	Walnut Creek Medical Center	S. California St.	Walnut Creek	Contra Costa
156	Walnut Creek Medical Center	S. Main St.	Walnut Creek	Contra Costa
157	Walnut Creek Medical Center	S. Main St.	Walnut Creek	Contra Costa
158	Walnut Creek Medical Center	S. Main St.	Walnut Creek	Contra Costa
159	Walnut Creek Medical Center	S. Main St.	Walnut Creek	Contra Costa
160	Park Shadelands Medical Offices	Shadelands	Walnut Creek	Contra Costa
161	Clovis Medical Offices	E. Herndon Ave.	Clovis	Fresno
162	Fresno Medical Center	Blackstone Ave.	Fresno	Fresno
163	Fresno Medical Center	E. Shaw Ave., Bldg. B	Fresno	Fresno
164	Fresno Medical Center	E. Shaw Ave., Bldg. C	Fresno	Fresno
165	Fresno Medical Center	N Cedar	Fresno	Fresno
166	Fresno Medical Center	N. First St.	Fresno	Fresno
167	Fresno Medical Center	N. Fresno	Fresno	Fresno
168	Fresno Medical Center	N. Fresno	Fresno	Fresno
169	Fresno Medical Center	N. Fresno	Fresno	Fresno
170	Fresno Medical Center	N. Fresno	Fresno	Fresno
171	Fresno Medical Center	N. Fresno	Fresno	Fresno
172	Fresno Medical Center	N. Fresno	Fresno	Fresno
173	Fresno Medical Center	N. Fresno	Fresno	Fresno
174	Fresno Medical Center	N. Fresno	Fresno	Fresno
175	Fresno Medical Center	N. Fresno	Fresno	Fresno
176	Fresno Medical Center	N. Fresno	Fresno	Fresno
177	Fresno Medical Center	N. Fresno	Fresno	Fresno
178	Fresno Medical Center	N. Fresno St., Ste. 400 & 480	Fresno	Fresno
179	Walmart Fresno - KP Care Corner	W. Shaw Ave.	Fresno	Fresno
180	Selma Medical Office	Highland Avenue	Selma	Fresno
181	Bakersfield Warehouse/Chartroom	16th St., Ste 100-107	Bakersfield	Kern
182	Bakersfield Warehouse/Chartroom	16th St., Ste 109 & 111	Bakersfield	Kern
183	Bakersfield Administrative Offices	California Ave.	Bakersfield	Kern
184	Bakersfield Behavior Health	California Ave., Ste. 200	Bakersfield	Kern
185	Chester Avenue Medical Offices	Chester Ave.	Bakersfield	Kern
186	Bakersfield Chester Medical Offices	Chester Ave., Ste. 305 & 310	Bakersfield	Kern

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
187	Coffee Road Medical Office	Coffee Road, Ste. 100	Bakersfield	Kern
188	Discovery Plaza Medical Offices	Discovery Dr.	Bakersfield	Kern
189	Walmart Bakersfield - KP Care Corner	Gosford Rd.	Bakersfield	Kern
190	East Hills Medical Offices	Mall View Dr.	Bakersfield	Kern
191	Ming Medical Offices	Ming Ave.	Bakersfield	Kern
192	Vision Essentials - Bakersfield	Ming Ave., Ste. L-1B	Bakersfield	Kern
193	Bakersfield San Dimas Medical Offices	San Dimas St.	Bakersfield	Kern
194	Stockdale Medical Offices	Stockdale Hwy.	Bakersfield	Kern
195	Tehachapi Medical Offices	Tehachapi Blvd., Ste. D	Tehachapi	Kern
196	Baldwin Park Medical Center	Baldwin Park Blvd.	Baldwin Park	Los Angeles
197	Baldwin Park Medical Center	Baldwin Park Blvd.	Baldwin Park	Los Angeles
198	Baldwin Park Medical Center	Baldwin Park Blvd.	Baldwin Park	Los Angeles
199	Baldwin Park Educational Outreach Prgrm	Maine St.	Baldwin Park	Los Angeles
200	Bellflower Medical Center	Rosecrans Ave.	Bellflower	Los Angeles
201	Bellflower Medical Center	Rosecrans Ave.	Bellflower	Los Angeles
202	Marketing, Sales, Service and Admin	Thornton Ave.	Burbank	Los Angeles
203	Carson Main Street Health Pavilion	S. Main St.	Carson	Los Angeles
204	Carson Main Street Health Pavilion	S. Main St.	Carson	Los Angeles
205	Cerritos Medical Offices	183rd Ave.	Cerritos	Los Angeles
206	Crossroads Medical Offices	Crossroads Pkwy.	City of Industry	Los Angeles
207	Indian Hill Medical Offices	W. San Jose Ave.	Claremont	Los Angeles
208	Cudahy Medical Offices	Atlantic Ave.	Cudahy	Los Angeles
209	West Los Angeles Medical Center	McConnell Ave.	Culver City	Los Angeles
210	Diamond Bar Medical Offices	Bridgegate Dr.	Diamond Bar	Los Angeles
211	Downey Administrative Office	Bellflower Blvd.	Downey	Los Angeles
212	Downey Boeing Building	Bellflower Blvd.	Downey	Los Angeles
213	Downey Service Center	Dalen St.	Downey	Los Angeles
214	Downey Medical Center	Imperial Hwy.	Downey	Los Angeles
215	Garden Medical Offices	Imperial Hwy.	Downey	Los Angeles
216	Imperial Medical Offices	Imperial Hwy.	Downey	Los Angeles
217	Imperial Medical Offices	Imperial Hwy.	Downey	Los Angeles
218	Imperial Medical Offices	Imperial Hwy.	Downey	Los Angeles
219	Imperial Medical Offices	Imperial Hwy.	Downey	Los Angeles
220	Imperial Medical Offices	Imperial Hwy.	Downey	Los Angeles
221	Carson South Bay Medical Offices	S. Figueroa St.	Gardena	Los Angeles
222	Gardena Medical Offices	S. Western Ave.	Gardena	Los Angeles
223	Glendale Orange Street Medical Offices	N. Orange St.	Glendale	Los Angeles
224	Glendale Medical Offices	W. Glenoaks Blvd.	Glendale	Los Angeles
225	San Fernando Home Health	Balboa Blvd.	Granada Hills	Los Angeles
226	South Bay Medical Center	S. Normandie Ave.	Harbor City	Los Angeles
227	South Bay Medical Center	S. Normandie Ave.	Harbor City	Los Angeles
228	South Bay Medical Center	S. Normandie Ave.	Harbor City	Los Angeles
229	South Bay Medical Center	S. Normandie Ave.	Harbor City	Los Angeles
230	South Bay Medical Center	S. Normandie Ave.	Harbor City	Los Angeles
231	South Bay Medical Center	S. Normandie Ave., Lot 10	Harbor City	Los Angeles
232	Coastline Medical Offices	S. Vermont St.	Harbor City	Los Angeles
233	South Bay Medical Center	S. Vermont St.	Harbor City	Los Angeles
234	South Bay Medical Center	S. Vermont St.	Harbor City	Los Angeles
235	South Bay Medical Center	Vermont Ave.	Harbor City	Los Angeles
236	South Bay Medical Center	W. Pacific Coast Hwy	Harbor City	Los Angeles
237	Parkview Medical Offices	W. Pacific Coast Hwy.	Harbor City	Los Angeles
238	Inglewood Medical Offices	N. La Brea Ave.	Inglewood	Los Angeles
239	Inglewood Vision Services	W. Century Blvd, Ste. B-3	Inglewood	Los Angeles
240	Irwindale Medical Offices	Schabarum Ave	Irwindale	Los Angeles
241	Irwindale Medical Offices	Schabarum Ave.	Irwindale	Los Angeles
242	La Puente Hacienda Medical Offices	N. Hacienda Blvd.	La Puente	Los Angeles
243	Antelope Valley OB/Gyn	15th St.	Lancaster	Los Angeles
244	Lancaster Medical Offices	15th St., W.	Lancaster	Los Angeles
245	Lancaster Medical Offices	15th St., W.	Lancaster	Los Angeles
246	Lancaster Medical Offices	20th St. W.	Lancaster	Los Angeles
247	Commerce Center Admin	Commerce Center Dr.	Lancaster	Los Angeles
248	Antelope Valley Medical Offices	West Ave. L	Lancaster	Los Angeles

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
249	Lancaster Medical Center	West Ave. L	Lancaster	Los Angeles
250	Lancaster Medical Center	West Ave. L	Lancaster	Los Angeles
251	Lomita Behavioral Health	Palos Verdes Dr. N.	Lomita	Los Angeles
252	Long Beach Plaza Medical Offices	E. Pac.Coast Hwy.	Long Beach	Los Angeles
253	West Los Angeles Medical Center	Cadillac Ave.	Los Angeles	Los Angeles
254	West Los Angeles Medical Center	Cadillac Ave.	Los Angeles	Los Angeles
255	West Los Angeles Medical Center	Crescent Hts.	Los Angeles	Los Angeles
256	West Los Angeles Medical Center	Crescent Hts.	Los Angeles	Los Angeles
257	West Los Angeles Medical Center	Crescent Hts.	Los Angeles	Los Angeles
258	Watts Learning Center	E. 103rd St.	Los Angeles	Los Angeles
259	Regional Service Center	Electronics Pl.	Los Angeles	Los Angeles
260	West Los Angeles Medical Center	Goldleaf Cir.	Los Angeles	Los Angeles
261	Los Angeles Medical Center	Hollywood Blvd.	Los Angeles	Los Angeles
262	Los Angeles Medical Center	Hollywood Blvd.	Los Angeles	Los Angeles
263	Los Angeles Medical Center	N. Edgemont St.	Los Angeles	Los Angeles
264	Los Angeles Medical Center	N. Edgemont St.	Los Angeles	Los Angeles
265	Los Angeles Medical Center	N. Edgemont St.	Los Angeles	Los Angeles
266	Los Angeles Medical Center	N. Kenmore Ave.	Los Angeles	Los Angeles
267	Los Angeles Medical Center	N. Vermont Ave.	Los Angeles	Los Angeles
268	East Los Angeles Medical Offices	Pomona Blvd.	Los Angeles	Los Angeles
269	Downtown LA Hope St. Medical Offices	S. Hope St., Ste. C-130	Los Angeles	Los Angeles
270	West Los Angeles Medical Center	S. La Cienega Blvd.	Los Angeles	Los Angeles
271	Robertson Administration	S. Robertson Blvd..	Los Angeles	Los Angeles
272	East Los Angeles Medical Offices	Telford St.	Los Angeles	Los Angeles
273	West Los Angeles Medical Center	Venice Blvd.	Los Angeles	Los Angeles
274	L.A. Mental Health Center	W. College St.	Los Angeles	Los Angeles
275	L.A. Mental Health Center	W. College St.	Los Angeles	Los Angeles
276	L.A. Mental Health Center	W. College St.	Los Angeles	Los Angeles
277	Annandale - 1 & 2	W. Colorado Blvd.	Los Angeles	Los Angeles
278	South Los Angeles Medical Offices	W. Manchester Ave.	Los Angeles	Los Angeles
279	Baldwin Hills Crenshaw Medical Offices	W. Martin Luther King Jr. Blvd.	Los Angeles	Los Angeles
280	Los Angeles Medical Center	W. Sunset Blvd.	Los Angeles	Los Angeles
281	Los Angeles Medical Center	W. Sunset Blvd.	Los Angeles	Los Angeles
282	Los Angeles Medical Center	W. Sunset Blvd.	Los Angeles	Los Angeles
283	Los Angeles Medical Center	W. Sunset Blvd.	Los Angeles	Los Angeles
284	Los Angeles Medical Center	W. Sunset Blvd.	Los Angeles	Los Angeles
285	Los Angeles Medical Center	W. Sunset Blvd.	Los Angeles	Los Angeles
286	Culver Marina Medical Offices	W. Washington Blvd.	Los Angeles	Los Angeles
287	Los Angeles Medical Center	Wilshire Blvd., 3rd Fl.	Los Angeles	Los Angeles
288	Lynwood	Martin Luther King Jr Blvd.	Lynwood	Los Angeles
289	Manhattan Beach Medical Offices	S. Sepulveda Blvd., Ste. 100	Manhattan Beach	Los Angeles
290	Mission Hills Medical Offices	Sepulveda Blvd.	Mission Hills	Los Angeles
291	Montebello Medical Offices	Town Center Dr.	Montebello	Los Angeles
292	North Hollywood Medical Offices	Lankershim Blvd.	North Hollywood	Los Angeles
293	Sherman Way Central Laboratory	Sherman Wy.	North Hollywood	Los Angeles
294	Sherman Way Central Laboratory	Sherman Wy.	North Hollywood	Los Angeles
295	Northridge Pharmacy	Rinaldi St., Ste. I	Northridge	Los Angeles
296	Norwalk Behavioral Health	Imperial Hwy., Ste 400	Norwalk	Los Angeles
297	Weidner Warehouse	Weidner St.	Pacoima	Los Angeles
298	Walmart Palmdale - KP Care Corner	47th St.	Palmdale	Los Angeles
299	Palmdale Medical Offices	East Ave S	Palmdale	Los Angeles
300	Panorama City Medical Center	Cantara St.	Panorama City	Los Angeles
301	Panorama City Medical Center	Cantara St.	Panorama City	Los Angeles
302	Panorama City Medical Center	Roscoe Blvd.	Panorama City	Los Angeles
303	Panorama City Medical Center	Roscoe Blvd.	Panorama City	Los Angeles
304	Panorama City Medical Center	Willard St.	Panorama City	Los Angeles
305	Panorama City Medical Center	Willard St.	Panorama City	Los Angeles
306	Panorama City Medical Center	Woodman Ave	Panorama City	Los Angeles
307	Panorama City Medical Center	Woodman Ave.	Panorama City	Los Angeles
308	Panorama City Medical Center	Woodman Ave.	Panorama City	Los Angeles
309	Panorama City Medical Center	Woodman Ave.	Panorama City	Los Angeles
310	Vision Essentials - Pasadena	E. Colorado Blvd.	Pasadena	Los Angeles



**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
311	Foothill - Pasadena Medical Offices	E. Foothill Blvd.	Pasadena	Los Angeles
312	Walnut Center - Regional Offices	E. Walnut St.	Pasadena	Los Angeles
313	Parsons	N. Fair Oaks Ave.	Pasadena	Los Angeles
314	Pasadena Medical Offices (old)	N. Lake Ave.	Pasadena	Los Angeles
315	Pasadena Medical Offices (old)	N. Lake Ave.	Pasadena	Los Angeles
316	Pasadena Medical Offices (old)	N. Lake Ave.	Pasadena	Los Angeles
317	Parsons	N. Pasadena Ave.	Pasadena	Los Angeles
318	S. Los Robles Administration	S. Los Robles	Pasadena	Los Angeles
319	S. Los Robles Administration	S. Los Robles Ave.	Pasadena	Los Angeles
320	S. Oakland Administration Offices	S. Oakland Ave.	Pasadena	Los Angeles
321	Porter Ranch Medical Offices	Rorter Ranch Dr. @ Rinaldi St.	Porter Ranch	Los Angeles
322	Reseda Mental Health/CDRP	Sherman Way	Reseda	Los Angeles
323	San Dimas Medical Offices	W. Arrow Hwy.	San Dimas	Los Angeles
324	San Dimas Medical Offices	W. Arrow Hwy.	San Dimas	Los Angeles
325	Canyon Country Medical Offices	Carl Boyer Dr.	Santa Clarita	Los Angeles
326	Santa Clarita Medical Offices	Tourney Rd.	Santa Clarita	Los Angeles
327	Santa Clarita Medical Offices	Tourney Rd.	Santa Clarita	Los Angeles
328	Santa Clarita Medical Offices 2	Tourney Rd.	Santa Clarita	Los Angeles
329	Tri-Central Administration	Telegraph Rd, #200	Santa Fe Springs	Los Angeles
330	Santa Monica Medical Offices	10th St.	Santa Monica	Los Angeles
331	Santa Monica Behavioral Health	Wilshire Blvd., Ste. 525	Santa Monica	Los Angeles
332	Signal Hill Medical Offices	E. Willow St.	Signal Hill	Los Angeles
333	Torrance Medical Offices	Madrona Ave.	Torrance	Los Angeles
334	Vernon Construction	E. 26th St.	Vernon	Los Angeles
335	West Covina Medical Offices	Sunset Ave.	West Covina	Los Angeles
336	West Covina Parkway Mental Health	W. Covina Pkwy.	West Covina	Los Angeles
337	West Covina Medical Offices	W. Garvey Ave.	West Covina	Los Angeles
338	West Covina Mental Health	W. Garvey Ave.	West Covina	Los Angeles
339	Whittier-Putnam Medical Offices	Whittier Blvd.	Whittier	Los Angeles
340	Burbank Administration	Burbank Blvd.	Woodland Hills	Los Angeles
341	Woodland Hills	Burbank Blvd.	Woodland Hills	Los Angeles
342	Woodland Hills	De Soto Ave.	Woodland Hills	Los Angeles
343	Erwin St. Medical Offices	Erwin St.	Woodland Hills	Los Angeles
344	Woodland Hills Medical Center	Ventura Blvd., Ste. 300	Woodland Hills	Los Angeles
345	Oakhurst Medical Offices	Westlake Dr.	Oakhurst	Madera
346	San Rafael Medical Center	Redwood Highway, Suite 1206	Mill Valley	Marin
347	Novato Medical Offices	Redwood Blvd.	Novato	Marin
348	Novato Medical Offices	Rowland Wy., Ste. 125	Novato	Marin
349	Novato Medical Offices	San Marin Dr.	Novato	Marin
350	Novato Medical Offices	San Marin Dr.	Novato	Marin
351	Novato Medical Offices	San Marin Dr.	Novato	Marin
352	San Rafael Medical Center	Los Gallinas	San Rafael	Marin
353	San Rafael Park MOB	Los Gamos Dr	San Rafael	Marin
354	San Rafael Medical Center	Los Gamos Dr.	San Rafael	Marin
355	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
356	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
357	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
358	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
359	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
360	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
361	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
362	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
363	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
364	San Rafael Medical Center	Montecillo Rd.	San Rafael	Marin
365	San Rafael Medical Center	Paul Dr.	San Rafael	Marin
366	San Rafael Medical Center	Smith Ranch Rd.	San Rafael	Marin
367	San Rafael Medical Center	Smith Ranch Rd.	San Rafael	Marin
368	San Rafael Medical Center	Smith Ranch Rd.	San Rafael	Marin
369	San Rafael Medical Center	Third St.	San Rafael	Marin
370	Napa Medical Offices	Claremont Wy.	Napa	Napa
371	Napa Medical Offices	Permanente Wy.	Napa	Napa
372	Aliso Viejo Medical Offices	Pacific Park Dr.	Aliso Viejo	Orange

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
373	Anaheim Hills Medical Offices	E. La Palma	Anaheim	Orange
374	Kraemer I Medical Offices	E. La Palma	Anaheim	Orange
375	Kraemer II Medical Offices	E. La Palma	Anaheim	Orange
376	Kraemer Radiation Oncology Center	E. La Palma	Anaheim	Orange
377	Kraemer Radiation Oncology Center	E. La Palma	Anaheim	Orange
378	Orange Co Anaheim Medical Center	E. La Palma	Anaheim	Orange
379	Orange Co Anaheim Medical Center	E. La Palma	Anaheim	Orange
380	Orange Co Anaheim Medical Center	E. La Palma	Anaheim	Orange
381	Richfield Business Center	E. La Palma, Ste. 101, 120 & 240	Anaheim	Orange
382	Miraloma Call Center	E. Miraloma Ave.	Anaheim	Orange
383	Euclid Medical Offices	N. Euclid	Anaheim	Orange
384	Lakeview Medical Center	N. Lakeview Ave.	Anaheim	Orange
385	East Street Warehouse	S. East St.	Anaheim	Orange
386	Brea Medical Office	E. Lambert Rd.	Brea	Orange
387	Foothill Ranch	Towne Centre Dr.	Foothill Ranch	Orange
388	Target - West Fullerton	W. Malvern Ave.	Fullerton	Orange
389	Garden Grove Medical Offices	Euclid St.	Garden Grove	Orange
390	Huntington Beach Medical Offices	Beach Blvd.	Huntington Beach	Orange
391	Alton/Sand Canyon Medical Offices	Alton Pkwy.	Irvine	Orange
392	Orange Co Irvine Medical Center	Alton Pkwy.	Irvine	Orange
393	Sand Canyon Medical Offices	Alton Pkwy.	Irvine	Orange
394	Barranca Medical Offices	Willard St.	Irvine	Orange
395	La Habra Medical Offices	E. Imperial Hwy.	La Habra	Orange
396	La Palma Medical Offices	Centrepont Dr.	La Palma	Orange
397	Laguna Hills	Avenida De La Carlota, Ste. 400	Laguna Hills	Orange
398	Mission Viejo Medical Offices	Maquina Ave.	Mission Viejo	Orange
399	Orange Health Pavilion	N. Lewis Ave.	Orange	Orange
400	Chapman Medical Offices	W. Chapman Ave.	Orange	Orange
401	Barcelona Warehouse	Barcelona Circle	Placentia	Orange
402	San Juan Capistrano Medical Offices	Camino Capistrano	San Juan Capistrano	Orange
403	Tustin Santa Ana Medical Offices	E. 4th St.	Santa Ana	Orange
404	Xerox Building Administration	E. First St., 11th/12th Flr.	Santa Ana	Orange
405	Harbor Corporate Park	S. Harbor Blvd, Ste. 100	Santa Ana	Orange
406	Harbor/MacArthur Medical Offices	S. Harbor Blvd.	Santa Ana	Orange
407	Tustin Home Health	E. 17th St., Ste. 300, 310 & 320	Tustin	Orange
408	Tustin Ranch Medical Offices	Michelle Dr.	Tustin	Orange
409	Yorba Linda Medical Offices	Savi Ranch Pkwy.	Yorba Linda	Orange
410	Lincoln Medical Offices	Dresden Dr.	Lincoln	Placer
411	Roseville Medical Center	E Roseville Pkwy., Bldg C	Roseville	Placer
412	Roseville Medical Center	E Roseville Pkwy., Bldg D, Unit 110, 120, 130	Roseville	Placer
413	Roseville Medical Center	Eureka Rd.	Roseville	Placer
414	Roseville Medical Center	Eureka Rd.	Roseville	Placer
415	Roseville Medical Center	Eureka Rd.	Roseville	Placer
416	Roseville Medical Center	Eureka Rd.	Roseville	Placer
417	Roseville Medical Center	Eureka Rd.	Roseville	Placer
418	Roseville Medical Center	Eureka Rd.	Roseville	Placer
419	Roseville Medical Center	Eureka Rd.	Roseville	Placer
420	Roseville Medical Center	Eureka Rd.	Roseville	Placer
421	Roseville Medical Center	Eureka Rd.	Roseville	Placer
422	Roseville Medical Center	Eureka Rd.	Roseville	Placer
423	Roseville Medical Center	Gibson Dr.	Roseville	Placer
424	Roseville Medical Center	Professional Dr.	Roseville	Placer
425	Roseville Medical Center	Riverside Ave	Roseville	Placer
426	Roseville Medical Center	Riverside Ave.	Roseville	Placer
427	Roseville Medical Center	Riverside Ave.	Roseville	Placer
428	Roseville Medical Center	Riverside Ave.	Roseville	Placer
429	Roseville Medical Center	Riverside Ave.	Roseville	Placer
430	Roseville Medical Center	Riverside Ave.	Roseville	Placer
431	Roseville Medical Center	Riverside Ave.	Roseville	Placer
432	Roseville Medical Center	Sierra Gardens	Roseville	Placer
433	Corona Data Center Admin	California Ave.	Corona	Riverside
434	Corona Member Svcs Call Center	California Ave.	Corona	Riverside

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
435	Granite Street Warehouse	Granite St.	Corona	Riverside
436	Corona Medical Offices	Kellogg Ave.	Corona	Riverside
437	Corona Medical Offices	Kellogg Ave.	Corona	Riverside
438	Corona Chart Room	S. Promenade Ave.	Corona	Riverside
439	Indio Medical Offices	Monroe St.	Indio	Riverside
440	Moreno Valley Heacock Medical Offices	Heacock St.	Moreno Valley	Riverside
441	Iris Medical Offices	Iris Ave.	Moreno Valley	Riverside
442	Iris Medical Offices	Iris Ave.	Moreno Valley	Riverside
443	Moreno Valley Medical Center	Iris Ave.	Moreno Valley	Riverside
444	Moreno Valley Medical Center	Iris Ave.	Moreno Valley	Riverside
445	Moreno Valley Medical Center	Iris Ave.	Moreno Valley	Riverside
446	Moreno Valley Medical Center	Iris Ave.	Moreno Valley	Riverside
447	Murrieta Medical Offices	Keller Rd.	Murrieta	Riverside
448	Coachella Valley Administrative Offices	Fred Waring Dr., Ste. 109-110	Palm Desert	Riverside
449	Palm Desert Medical Office	Gerald Ford Dr.	Palm Desert	Riverside
450	Palm Springs Medical Office	N Palm Canyon Dr., Ste. 208 & 209	Palm Springs	Riverside
451	Canyon Crest Mental Health Offices	Canyon Crest Dr.	Riverside	Riverside
452	Canyon Crest Mental Health Offices	Canyon Crest Dr.	Riverside	Riverside
453	Fresenius MC - Riverside	La Sierra Ave	Riverside	Riverside
454	Riverside Home Health	Magnolia Ave.	Riverside	Riverside
455	Riverside Home Health	Magnolia Ave.	Riverside	Riverside
456	Riverside Home Health	Magnolia Ave.	Riverside	Riverside
457	Riverside Magnolia Noth Administration	Magnolia Ave.	Riverside	Riverside
458	Riverside Medical Center	Magnolia Ave.	Riverside	Riverside
459	Riverside Medical Center	Magnolia Ave.	Riverside	Riverside
460	Riverside Medical Center	Magnolia Ave.	Riverside	Riverside
461	Riverside Medical Center	Magnolia Ave.	Riverside	Riverside
462	Riverside Medical Center	Magnolia Ave.	Riverside	Riverside
463	Riverside Administration	Magnolia Avenue	Riverside	Riverside
464	Meridian Medical Offices	Meridian Pkwy.	Riverside	Riverside
465	Van Buren Medical Offices	Van Buren Blvd.	Riverside	Riverside
466	Temecula Medical Offices	Madison Ave.	Temecula	Riverside
467	Temecula Medical Offices	Madison Ave.	Temecula	Riverside
468	Wildomar Medical Offices	Inland Valley Dr.	Wildomar	Riverside
469	Elk Grove Medical Offices	Big Horn Blvd.	Elk Grove	Sacramento
470	Promenade Medical Offices	Promenade Pkwy.	Elk Grove	Sacramento
471	Elk Grove Medical Offices	W. Stockton Blvd.	Elk Grove	Sacramento
472	Folsom Medical Offices	Iron Point Cir.	Folsom	Sacramento
473	Folsom Medical Offices	Iron Point Rd.	Folsom	Sacramento
474	Folsom Medical Offices	Palladio Pkwy.	Folsom	Sacramento
475	Rancho Cordova Medical Offices	International Dr.	Rancho Cordova	Sacramento
476	Rancho Cordova Medical Offices	International Dr.	Rancho Cordova	Sacramento
477	South Sacramento Medical Center	J St., Ste. 352	Sacramento	Sacramento
478	Sacramento Medical Center	Alta Arden Expressway	Sacramento	Sacramento
479	Sacramento Medical Center	Alta Arden Expressway	Sacramento	Sacramento
480	Sacramento Medical Center	Alta Arden Expressway	Sacramento	Sacramento
481	South Sacramento Medical Center	Alta Valley Dr.Suite 100,105,180,200,212,	Sacramento	Sacramento
482	Sacramento Medical Center	Arden Wy.	Sacramento	Sacramento
483	Sacramento Medical Center	Arden Wy.	Sacramento	Sacramento
484	Sacramento Medical Center	Arden Wy.	Sacramento	Sacramento
485	Sacramento Medical Center	Arden Wy., Ste. 202-16	Sacramento	Sacramento
486	Sacramento Medical Center	Arden Wy., Ste. 202-18	Sacramento	Sacramento
487	Sacramento Medical Center	Auburn Blvd., #205	Sacramento	Sacramento
488	Sacramento Medical Center	Bell St.	Sacramento	Sacramento
489	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
490	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
491	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
492	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
493	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
494	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
495	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
496	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
497	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
498	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
499	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
500	South Sacramento Medical Center	Bruceville Rd.	Sacramento	Sacramento
501	Sacramento Medical Center	Cottage Wy.	Sacramento	Sacramento
502	Sacramento Medical Center	Cottage Wy.	Sacramento	Sacramento
503	South Sacramento Medical Center	E. Stockton Blvd.	Sacramento	Sacramento
504	South Sacramento Medical Center	E. Stockton Blvd.	Sacramento	Sacramento
505	Sacramento Medical Center	Fair Oaks Blvd	Sacramento	Sacramento
506	Sacramento Florin Towne Center	Florin Rd., Ste. B1-B	Sacramento	Sacramento
507	Sacramento Railroad Yard	G St., Ste. 400 & 500	Sacramento	Sacramento
508	Sacramento Medical Center	Howe Ave.	Sacramento	Sacramento
509	Sacramento Railroad Yard	J St.	Sacramento	Sacramento
510	South Sacramento Medical Center	J St. Ste. 109	Sacramento	Sacramento
511	Ordway	K St., Ste. 2030	Sacramento	Sacramento
512	Sacramento Railroad Yard	L St.	Sacramento	Sacramento
513	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
514	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
515	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
516	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
517	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
518	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
519	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
520	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
521	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
522	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
523	Sacramento Medical Center	Morse Ave.	Sacramento	Sacramento
524	North Sacramento Promenade	N. Freeway Blvd., Ste. 100	Sacramento	Sacramento
525	Sacramento Medical Center	Response Rd.	Sacramento	Sacramento
526	Sacramento Medical Center	River Park Drive, Ste. 202 & 411	Sacramento	Sacramento
527	Sacramento Medical Center	Watt Ave.	Sacramento	Sacramento
528	South Sacramento Medical Center	Wyndham Dr.	Sacramento	Sacramento
529	Chino Medical Offices	Central Ave.	Chino	San Bernardino
530	Chino Hills Medical Offices	Grand Ave.	Chino	San Bernardino
531	Chino Hills Medical Offices	Grand Ave.	Chino	San Bernardino
532	Chino Hills Medical Offices	Grand Ave.	Chino	San Bernardino
533	Chino Hills Regional Laboratory	Peyton Dr.	Chino Hills	San Bernardino
534	Colton Medical Offices	Cooley Dr.	Colton	San Bernardino
535	Fontana Medical Center	Hawthorne Ave.	Fontana	San Bernardino
536	Fontana Medical Center	Marygold Ave.	Fontana	San Bernardino
537	Fontana Medical Center	Marygold Ave.	Fontana	San Bernardino
538	Fontana Medical Center	Marygold Ave.	Fontana	San Bernardino
539	Fontana Medical Offices 5 - Behavioral	Marygold Ave.	Fontana	San Bernardino
540	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
541	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
542	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
543	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
544	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
545	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
546	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
547	Fontana Medical Center	Sierra Ave.	Fontana	San Bernardino
548	Fontana Medical Center	Sierra Ave., Ste. 111	Fontana	San Bernardino
549	Corona Member Svcs Call Center	Slover Ave.	Fontana	San Bernardino
550	Palm Court Center (Slover)	Slover Ave.	Fontana	San Bernardino
551	Palm Court Center (Slover)	Slover Ave.	Fontana	San Bernardino
552	Palm Court Center (Slover)	Slover Ave.	Fontana	San Bernardino
553	Target - Fontana North	Summit Ave.	Fontana	San Bernardino
554	Fontana Medical Center	Valley Blvd.	Fontana	San Bernardino
555	Fontana Medical Center	Valley Blvd.	Fontana	San Bernardino
556	Fontana Medical Center	Valley Blvd.	Fontana	San Bernardino
557	Fontana Medical Center	Valley Blvd.	Fontana	San Bernardino
558	Hesperia Main Street Offices	Main St., Ste. 301	Hesperia	San Bernardino

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
559	Montclair Mental Health	San Bernardino St.	Montclair	San Bernardino
560	Ontario Mental Health	Centre Lake Dr.	Ontario	San Bernardino
561	Ontario Records Retention Center	S. Turner Ave.	Ontario	San Bernardino
562	Ontario Medical Center	South Vineyard	Ontario	San Bernardino
563	Ontario Medical Center	South Vineyard	Ontario	San Bernardino
564	Ontario Medical Center	South Vineyard	Ontario	San Bernardino
565	Ontario Medical Center	South Vineyard	Ontario	San Bernardino
566	Ontario Medical Center	South Vineyard	Ontario	San Bernardino
567	Empire Corporate Plaza	4th St.	Rancho Cucamonga	San Bernardino
568	Rancho Cucamonga Medical Offices	Arrow Rte.	Rancho Cucamonga	San Bernardino
569	Redlands Medical Offices	California St.	Redlands	San Bernardino
570	San Bernadino Medical Offices	E. Date Pl.	San Bernardino	San Bernardino
571	San Bernadino Mental Health	W. Hospitality Ln.	San Bernardino	San Bernardino
572	Upland Medical Offices	E. Foothill Blvd	Upland	San Bernardino
573	Victorville Medical Offices	Park Ave.	Victorville	San Bernardino
574	Victorville Medical Offices	Park Ave.	Victorville	San Bernardino
575	Bonita Medical Offices	Bonita Rd.	Bonita	San Diego
576	Bonita Medical Offices	Bonita Rd.	Bonita	San Diego
577	Bonita Medical Offices	Bonita Rd.	Bonita	San Diego
578	Bonita Medical Offices	Bonita Rd.	Bonita	San Diego
579	Bonita Medical Offices	Bonita Rd.	Bonita	San Diego
580	Carlsbad Medical Offices	Avenida Encinas	Carlsbad	San Diego
581	El Cajon - Bostonia Medical Offices	E. Main St.	El Cajon	San Diego
582	El Cajon - Bostonia Medical Offices	E. Main St.	El Cajon	San Diego
583	El Cajon Medical Offices/OP Surgery Cntr	Travelodge Dr.	El Cajon	San Diego
584	Escondido Medical Offices	N. Broadway	Escondido	San Diego
585	Rancho San Diego Medical Offices	Avocado Blvd.	La Mesa	San Diego
586	La Mesa Medical/Administrative Offices	Parkway Dr.	La Mesa	San Diego
587	La Mesa Medical/Administrative Offices	Parkway Dr.	La Mesa	San Diego
588	Oceanside Ranch Del Oro Medical Offices	Rocky Point Dr.	Oceanside	San Diego
589	Rancho Bernardo Medical Offices	Bernardo Center Dr.	San Diego	San Diego
590	Target - San Diego Mission Valley	Camino Del Rio N.	San Diego	San Diego
591	Clairemont Mesa Medical Offices	Clairemont Mesa Blvd.	San Diego	San Diego
592	San Diego Medical Center	Clairemont Mesa Blvd.	San Diego	San Diego
593	San Diego Medical Center	Clairemont Mesa Blvd.	San Diego	San Diego
594	Positive Choice	Convoy Ct.	San Diego	San Diego
595	Positive Choice	Convoy Ct., Ste. 100	San Diego	San Diego
596	Garfield Specialty Care	Copley Dr.	San Diego	San Diego
597	Kaiser Permanente On-Call	Copley Dr.	San Diego	San Diego
598	General Dynamics NASSCO Clinic	E. Harbor Dr.	San Diego	San Diego
599	El Camino Real Administration	El Camino Real, Ste. 105	San Diego	San Diego
600	Point Loma Medical Offices	Fordham St.	San Diego	San Diego
601	Scripps La Jolla	Genesee Ave., Ste. 114	San Diego	San Diego
602	Point Loma Medical Offices	Kenyon St.	San Diego	San Diego
603	Mission Trail Medical Records	Mission Gorge Rd.	San Diego	San Diego
604	Zion Medical Center	Mission Gorge Rd.	San Diego	San Diego
605	California Service Center	Murphy Canyon Rd.	San Diego	San Diego
606	Zion Medical Center	Orcutt Ave.	San Diego	San Diego
607	HealthSpot San Diego County	Overland Ave.	San Diego	San Diego
608	Otay Mesa Medical Offices	Palm Ave.	San Diego	San Diego
609	Otay Mesa Medical Offices	Palm Ave.	San Diego	San Diego
610	California Service Center - Rio S.D.	Rio San Diego Dr.	San Diego	San Diego
611	San Diego Sales & Marketing	Rio San Diego Dr., 2nd Fl.	San Diego	San Diego
612	Mission Road Administration Buildings	S.D. Mission Rd.	San Diego	San Diego
613	Mission Road Administration Buildings	S.D. Mission Rd.	San Diego	San Diego
614	Carmel Valley Medical Offices	Shaw Ridge Rd.	San Diego	San Diego
615	Riverdale Support Services	Vandever Ave.	San Diego	San Diego
616	San Diego Mobile Health Vehicle	Vandever Ave.	San Diego	San Diego
617	Vandever Medical Offices	Vandever Ave.	San Diego	San Diego
618	Kearny Mesa Rehab Center	Viewridge Ave.	San Diego	San Diego
619	Viewridge 1 Medical Offices	Viewridge Ct.	San Diego	San Diego
620	Viewridge 2 Medical Offices	Viewridge Ct.	San Diego	San Diego

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
621	Mesa Vista Offsite	Vista Hill Ave., Ste 160	San Diego	San Diego
622	Zion Medical Center	Zion Ave.	San Diego	San Diego
623	Zion Medical Center	Zion Ave.	San Diego	San Diego
624	Zion Medical Center	Zion Ave.	San Diego	San Diego
625	Zion Medical Center	Zion Ave.	San Diego	San Diego
626	Zion Medical Center	Zion Ave.	San Diego	San Diego
627	Zion Medical Center	Zion Ave.	San Diego	San Diego
628	Zion Medical Center	Zion Ave.	San Diego	San Diego
629	San Marcos Medical Offices	Craven Rd.	San Marcos	San Diego
630	San Marcos Medical Offices	Craven Rd.	San Marcos	San Diego
631	Vista Home Health	Shadowridge Dr.	Vista	San Diego
632	Target - Vista	University Ave.	Vista	San Diego
633	San Francisco - Geary Medical Center	6th Ave.	San Francisco	San Francisco
634	San Francisco - Geary Medical Center	Divisadero St.	San Francisco	San Francisco
635	San Francisco - Geary Medical Center	Divisadero St.	San Francisco	San Francisco
636	San Francisco - Geary Medical Center	Fillmore St.	San Francisco	San Francisco
637	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
638	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
639	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
640	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
641	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
642	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
643	San Francisco - Geary Medical Center	Geary Blvd.	San Francisco	San Francisco
644	San Francisco - Geary Medical Center	Geary Blvd. (Church)	San Francisco	San Francisco
645	San Francisco - Geary Medical Center	Geary Blvd. (Dental)	San Francisco	San Francisco
646	San Francisco - Geary Medical Center	Market St, Ste. 925 & 1010	San Francisco	San Francisco
647	San Francisco - Geary Medical Center	O'Farrell St.	San Francisco	San Francisco
648	San Francisco - Geary Medical Center	O'Farrell St.	San Francisco	San Francisco
649	San Francisco - Geary Medical Center	O'Farrell St.	San Francisco	San Francisco
650	San Francisco Mission Bay Medical Office	Owens St.	San Francisco	San Francisco
651	San Francisco Mission Bay Medical Office	Owens St.	San Francisco	San Francisco
652	San Francisco - Geary Medical Center	Sixth Avenue	San Francisco	San Francisco
653	San Francisco - Geary Medical Center	St Josephs Ave.	San Francisco	San Francisco
654	San Francisco - Geary Medical Center	Van Ness Ave.	San Francisco	San Francisco
655	Manteca Medical Center	W. Yosemite Ave.	Manteca	San Joaquin
656	Manteca Medical Center	W. Yosemite Ave.	Manteca	San Joaquin
657	Manteca Medical Center	W. Yosemite Ave.	Manteca	San Joaquin
658	Manteca Medical Center	W. Yosemite Ave.	Manteca	San Joaquin
659	Manteca Medical Center	W. Yosemite Ave.	Manteca	San Joaquin
660	Manteca Medical Center	W. Yosemite Ave.	Manteca	San Joaquin
661	Stockton Medical Center	Tommydon St.	Stockton	San Joaquin
662	Stockton Medical Center	W. Acacia St., Ste. 10 & 12	Stockton	San Joaquin
663	Stockton Medical Center	West Ln.	Stockton	San Joaquin
664	Stockton Medical Center	West Ln.	Stockton	San Joaquin
665	Stockton Medical Center	West Ln.	Stockton	San Joaquin
666	Stockton Medical Center	West Ln.	Stockton	San Joaquin
667	Stockton Medical Center	West Ln.	Stockton	San Joaquin
668	Tracy Medical Offices	Naglee Rd, Ste. 8A	Tracy	San Joaquin
669	Tracy Medical Offices	W. Grant Line Rd.	Tracy	San Joaquin
670	Daly City Medical Offices	Hickey Blvd	Daly City	San Mateo
671	South San Francisco Medical Center	Junipero Serra Blvd., Ste. 650	Daly City	San Mateo
672	Daly City Medical Offices	Southgate Ave., 2nd Floor, Suite 202	Daly City	San Mateo
673	Redwood City Medical Center	Bair Island Rd. Ste 109	Redwood City	San Mateo
674	Redwood City Medical Center	Broadway	Redwood City	San Mateo
675	Redwood City Medical Center	Galveston Dr.	Redwood City	San Mateo
676	Redwood City Medical Center	Main St.	Redwood City	San Mateo
677	Redwood City Medical Center	Maple St	Redwood City	San Mateo
678	Redwood City Medical Center	Maple St.	Redwood City	San Mateo
679	Redwood City Medical Center	Maple St.	Redwood City	San Mateo
680	Redwood City Medical Center	Maple St.	Redwood City	San Mateo
681	Redwood City Medical Center	Maple St.	Redwood City	San Mateo
682	Redwood City Medical Center	Marshall Ct.	Redwood City	San Mateo

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
683	Redwood City Medical Center	Marshall St.	Redwood City	San Mateo
684	Redwood City Medical Center	Marshall St.	Redwood City	San Mateo
685	Redwood City Medical Center	Marshall St.	Redwood City	San Mateo
686	Redwood City Medical Center	Marshall St.	Redwood City	San Mateo
687	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
688	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
689	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
690	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
691	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
692	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
693	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
694	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
695	Redwood City Medical Center	Veterans Blvd.	Redwood City	San Mateo
696	South San Francisco Medical Center	El Camino Real	San Bruno	San Mateo
697	South San Francisco Medical Center	Sneath Ln.	San Bruno	San Mateo
698	South San Francisco Medical Center	Sneath Ln.	San Bruno	San Mateo
699	South San Francisco Medical Center	Traeger Ave.	San Bruno	San Mateo
700	South San Francisco Medical Center	Traeger Ave.	San Bruno	San Mateo
701	San Mateo Medical Offices	Franklin Pkwy.	San Mateo	San Mateo
702	Redwood City Medical Center	S. Norfolk St.	San Mateo	San Mateo
703	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
704	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
705	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
706	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
707	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
708	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
709	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
710	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
711	South San Francisco Medical Center	El Camino Real	South San Francisco	San Mateo
712	South San Francisco Medical Center	Oyster Point Blvd.	South San Francisco	San Mateo
713	Campbell Medical Offices	E. Hacienda Ave.	Campbell	Santa Clara
714	Campbell Medical Offices	E. Hacienda Ave., Bldg B	Campbell	Santa Clara
715	Campbell Medical Offices	E. Hacienda Ave., Bldg D	Campbell	Santa Clara
716	Santa Clara Homestead Medical Center	Homestead Rd.	Cupertino	Santa Clara
717	Santa Clara Homestead Medical Center	N. Wolfe Rd., Ste. SW1-190	Cupertino	Santa Clara
718	Gilroy Medical Offices	Arroyo Cir.	Gilroy	Santa Clara
719	Gilroy Medical Offices	Arroyo Circle & Camino Arroyo	Gilroy	Santa Clara
720	Milpitas Medical Offices	E. Calaveras Blvd.	Milpitas	Santa Clara
721	Milpitas Medical Offices	E. Calaveras Blvd.	Milpitas	Santa Clara
722	Milpitas Medical Offices	Los Coches St.	Milpitas	Santa Clara
723	Milpitas Medical Offices	S. Milpitas Blvd.	Milpitas	Santa Clara
724	Mt. View Medical Offices	Castro St.	Mountain View	Santa Clara
725	Mt. View Medical Offices	Castro St.	Mountain View	Santa Clara
726	Mt. View Medical Offices	Castro St.	Mountain View	Santa Clara
727	NCAL Regional Genetics Laboratory	Cottle Rd.	San Jose	Santa Clara
728	San Jose Medical Center	Cottle Rd.	San Jose	Santa Clara
729	San Jose Medical Center	Cottle Rd.	San Jose	Santa Clara
730	San Jose Medical Center	Cottle Rd.	San Jose	Santa Clara
731	San Jose Medical Center	Cottle Rd.	San Jose	Santa Clara
732	San Jose Medical Center	Cottle Rd.	San Jose	Santa Clara
733	San Jose Medical Center	Cottle Rd.	San Jose	Santa Clara
734	San Jose - The Plant	Curtner Ave., #60	San Jose	Santa Clara
735	San Jose Medical Center	Great Oaks Blvd.	San Jose	Santa Clara
736	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
737	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
738	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
739	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
740	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
741	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
742	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
743	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
744	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara

**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
745	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
746	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
747	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
748	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
749	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
750	San Jose Medical Center	Hospital Pkwy.	San Jose	Santa Clara
751	San Jose Medical Center	International Circle	San Jose	Santa Clara
752	San Jose Medical Center	International Circle	San Jose	Santa Clara
753	San Jose Medical Center	International Circle	San Jose	Santa Clara
754	San Jose Medical Center	International Circle	San Jose	Santa Clara
755	San Jose Medical Center	International Circle	San Jose	Santa Clara
756	San Jose Medical Center	International Circle	San Jose	Santa Clara
757	San Jose Medical Center	International Circle	San Jose	Santa Clara
758	San Jose Medical Center	N. 1st St., Bldg. Q	San Jose	Santa Clara
759	Campbell Medical Offices	Samaritan Dr. Ste. 2	San Jose	Santa Clara
760	San Jose Skyport Medical Offices	Technology Dr.	San Jose	Santa Clara
761	San Jose Medical Center	Via del Oro	San Jose	Santa Clara
762	Santa Clara Homestead Medical Center	Augustine Dr.	Santa Clara	Santa Clara
763	Santa Clara Homestead Medical Center	Freedom Cir., Ste. 201	Santa Clara	Santa Clara
764	Santa Clara Behavioral Health Center	Homestead Rd.	Santa Clara	Santa Clara
765	Santa Clara Homestead Medical Center	Homestead Rd.	Santa Clara	Santa Clara
766	Santa Clara Homestead Medical Center	Homestead Rd.	Santa Clara	Santa Clara
767	Santa Clara Homestead Medical Center	Lawrence Express Wy.	Santa Clara	Santa Clara
768	Santa Clara Homestead Medical Center	Lawrence Express Wy.	Santa Clara	Santa Clara
769	Santa Clara Homestead Medical Center	Lawrence Express Wy.	Santa Clara	Santa Clara
770	Santa Clara Homestead Medical Center	Lawrence Express Wy.	Santa Clara	Santa Clara
771	Santa Clara Homestead Medical Center	Arques Ave.	Sunnyvale	Santa Clara
772	Santa Cruz Medical Offices	Locust St.	Santa Cruz	Santa Cruz
773	Santa Cruz Marketing	Pacific Ave., Ste. 210	Santa Cruz	Santa Cruz
774	Scotts Valley Medical Offices	Scotts Valley Dr.	Scotts Valley	Santa Cruz
775	Scotts Valley Medical Offices	Scotts Valley Dr.	Scotts Valley	Santa Cruz
776	Watsonville Marketing	Main St.	Watsonville	Santa Cruz
777	Watsonville Medical Offices	Main St.	Watsonville	Santa Cruz
778	Fairfield Medical Offices	Business Center Dr.	Fairfield	Solano
779	Fairfield Medical Offices	Gateway Blvd.	Fairfield	Solano
780	Vacaville Medical Offices	Quality Dr.	Vacaville	Solano
781	Vacaville Medical Offices	Quality Dr.	Vacaville	Solano
782	Vacaville Medical Offices	Quality Dr.	Vacaville	Solano
783	Vacaville Medical Offices	Quality Dr.	Vacaville	Solano
784	Vallejo Medical Center	Broadway	Vallejo	Solano
785	Vallejo Medical Center	Broadway	Vallejo	Solano
786	Vallejo Call Center	Broadway St.	Vallejo	Solano
787	Vallejo Call Center	Broadway St.	Vallejo	Solano
788	Vallejo Medical Center	N. Camino Alto, Apt. 46	Vallejo	Solano
789	Vallejo Medical Center	N. Camino Alto, Apt. 48	Vallejo	Solano
790	Vallejo Medical Center	N. Camino Alto, Apt. 50	Vallejo	Solano
791	Vallejo Medical Center	N. Camino Alto, Apt. 54	Vallejo	Solano
792	Vallejo Medical Center	N. Camino Alto, Apt. 56	Vallejo	Solano
793	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
794	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
795	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
796	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
797	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
798	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
799	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
800	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
801	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
802	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
803	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
804	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
805	Vallejo Medical Center	Sereno Dr.	Vallejo	Solano
806	Petaluma Medical Offices	Lakeville Hwy.	Petaluma	Sonoma



**EXHIBIT A - Kaiser Covered Facilities**

	<b>Location Name</b>	<b>Building Address</b>	<b>City</b>	<b>County</b>
807	Petaluma Medical Offices	Lakeville Hwy.	Petaluma	Sonoma
808	Rohnert Park Medical Offices	State Farm Dr.	Rohnert Park	Sonoma
809	Santa Rosa Medical Center	Bicentennial Way	Santa Rosa	Sonoma
810	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
811	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
812	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
813	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
814	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
815	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
816	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
817	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
818	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
819	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
820	Santa Rosa Medical Center	Bicentennial Wy.	Santa Rosa	Sonoma
821	Santa Rosa Medical Center	Mendocino Ave., Ste. 120, 130, 230 & 240	Santa Rosa	Sonoma
822	Santa Rosa Mercury Way	Mercury Wy.	Santa Rosa	Sonoma
823	Santa Rosa Mercury Way	Mercury Wy., Ste. 240	Santa Rosa	Sonoma
824	Santa Rosa Medical Center	Old Redwood Hwy.	Santa Rosa	Sonoma
825	Santa Rosa Medical Center	Old Redwood Hwy.	Santa Rosa	Sonoma
826	Santa Rosa Medical Center	Round Barn Blvd.	Santa Rosa	Sonoma
827	Santa Rosa Medical Center	Round Barn Blvd.	Santa Rosa	Sonoma
828	Santa Rosa Medical Center	Round Barn Rd.	Santa Rosa	Sonoma
829	Santa Rosa Medical Center	Roundbarn Rd.	Santa Rosa	Sonoma
830	Modesto Medical Center	Bangs Ave.	Modesto	Stanislaus
831	Modesto Medical Center	Dale Rd	Modesto	Stanislaus
832	Modesto Medical Center	Dale Rd.	Modesto	Stanislaus
833	Modesto Medical Center	Dale Rd.	Modesto	Stanislaus
834	Modesto Medical Center	Dale Rd.	Modesto	Stanislaus
835	Modesto Northpoint	McHenry Ave., Ste. 325	Modesto	Stanislaus
836	Modesto Medical Center	Standiford Ave., Ste. 5	Modesto	Stanislaus
837	Regus - Irving	E. Royal Ln., Ste. 290	Irving	Tarrant
838	Los Posas Medical Offices	E. Los Posas Rd.	Camarillo	Ventura
839	Camarillo Pharmacy	W. Ventura Blvd., Ste. 8	Camarillo	Ventura
840	Oxnard E. Gonzales Rd. Medical Offi	E. Gonzales Rd.	Oxnard	Ventura
841	Oxnard Medical Office	E. Gonzales Rd.	Oxnard	Ventura
842	Almo Street Medical Offices	Alamo St.	Simi Valley	Ventura
843	Thousand Oaks E. Hillcrest Dr.	E. Hillcrest Dr.	Thousand Oaks	Ventura
844	Thousand Oaks E. Thousand Oaks Blvd.	E. Thousand Oaks Blvd.	Thousand Oaks	Ventura
845	Thousand Oaks Hodencamp Rd.	Hodencamp Rd., Ste. 100	Thousand Oaks	Ventura
846	Main Administration Offices	E. Main St.	Ventura	Ventura
847	Ventura E. Main Medical Offices	E. Main St.	Ventura	Ventura
848	Ventura Market St. Medical Offices	Market St.	Ventura	Ventura
849	Ventura S. Hill Road Medical Offices	S. Hill Rd.	Ventura	Ventura
850	Ventura Medical Offices	S. Hill Rd., Ste. 100	Ventura	Ventura
851	Davis Medical Offices	Cowell Blvd.	Davis	Yolo