

EDMUND G. BROWN JR.
 Attorney General of California
 J. MATTHEW RODRIQUEZ
 Chief Assistant Attorney General
 KEN ALEX
 Senior Assistant Attorney General
 TIMOTHY R. PATTERSON, SBN 072209
 Supervising Deputy Attorney General
 ANN RUSHTON, SBN 062597
 BRETT J. MORRIS, SBN 158408
 Deputy Attorneys General
 1515 Clay Street, 20th Floor
 P.O. Box 70550
 Oakland, CA 94612-0550
 Telephone: (510) 622-2176
 Fax: (510) 622-2270

*Attorneys for Plaintiff
 The People of the State of California*

(Additional counsel on following pages)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

TARGET CORPORATION, a Minnesota
 Corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 109 457000

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

(Health & Saf. Code, Div. 20,
 Chapters 6.5 and 6.95; Bus & Prof.
 Code, § 17200, *et seq.*)

**ENDORSED
 FILED
 ALAMEDA COUNTY**

JUN 15 2009

CLERK OF THE SUPERIOR COURT
 By: _____

1 THOMAS J. ORLOFF
District Attorney of Alameda County
2 KENNETH A. MIFSUD, SBN 144000
MICHAEL J. ROEMER, SBN 100155
3 Deputy District Attorneys
Consumer and Environmental Protection Division
4 7677 Oakport Street, Suite 650
Oakland, CA 94621-1934
5 Telephone: (510) 569-8816

6 ROBERT J. KOCHLY
District Attorney of Contra Costa County
7 LAUREN R. WIXSON, SBN 117178
Deputy District Attorney
8 900 Ward Street
P.O. Box 670
9 Martinez, CA 94553-0150
Telephone: (925) 957-8786
10

11 ELIZABETH A. EGAN
District Attorney of Fresno County
12 MICHAEL BRUMMEL, SBN 236116
Deputy District Attorney
13 929 L Street
Fresno, CA 93721
14 Telephone: (559) 488-3156

15 PAUL V. GALLEGOS
District Attorney of Humboldt County
16 MATTHEW C. MACLEAR, SBN 209228
Deputy District Attorney
17 825 5th Street
Eureka, CA 95501
18 Telephone: (707) 445-7411

19 RONALD CALHOUN
District Attorney of Kings County
20 MATTHEW C. MACLEAR, SBN 209228
Deputy District Attorney
21 1400 W. Lacey Boulevard
Hanford, CA 93230-5962
22 Telephone: (559) 582-0326

23 ROCKARD J. DELGADILLO
City Attorney of Los Angeles
24 VAUGHN G. MINASSIAN, SBN 203574
Deputy City Attorney
25 City Hall East
200 N. Main Street, 5th Floor
26 Los Angeles, CA 90012
Telephone: (213) 978-8080
27
28

1 STEVE COOLEY
District Attorney of Los Angeles County
2 DANIEL J. WRIGHT, SBN 129309
Deputy District Attorney
3 Consumer Protection Division
Environmental Law Section
4 201 N. Figueroa Street, Suite 1200
Los Angeles, CA 90012
5 Telephone: (213) 580-3209

6 LARRY D. MORSE
District Attorney of Merced County
7 MATTHEW C. MACLEAR, SBN 209228
Deputy District Attorney
8 2222 M. Street
Merced, CA 95340
9 Telephone: (209) 385-7381

10 DEAN D. FLIPPO
District Attorney of Monterey County
11 ANNE M. MICHAELS, SBN 136134
Managing Deputy District Attorney
12 DIJE NDREU, SBN 251278
Deputy District Attorney
13 1200 Aguajito Road, Room 301
Monterey, CA 93940
14 Telephone: (831) 647-7770

15 TONY RACKAUCKAS
District Attorney of Orange County
16 WILLIAM G. FALLON, SBN 190986
Deputy District Attorney
17 401 Civic Center Drive West
Santa Ana, CA 92701
18 Telephone: (714) 648-3622

19 ROD PACHECO
District Attorney of Riverside County
20 STEPHANIE WEISSMAN, SBN 155454
Supervising Deputy District Attorney
21 DALE C. HOY, SBN 226182
Deputy District Attorney
22 4075 Main Street, First Floor
Riverside, CA 92501
23 Telephone: (951) 955-6207

24
25
26
27
28

1 JAN SCULLY
District Attorney of Sacramento County
2 JANE CRUE, SBN 210122
Deputy District Attorney
3 Consumer & Environmental Protection Division
906 G Street, Suite 700
4 Sacramento, CA 95814
Telephone: (916) 874-6174
5

6 MICHAEL A. RAMOS
District Attorney of San Bernardino County
7 R. GLENN YABUNO, SBN 109471
Lead Deputy District Attorney
8 412 W. Hospitality Lane, Suite 301
San Bernardino, CA 92415-0023
9 Telephone: (909) 891-3330

10 BONNIE M. DUMANIS
District Attorney of San Diego County
11 KAREN I. DOTY, SBN 126448
JAMES WATERS, SBN 102489
12 Deputy District Attorneys
Hall of Justice
13 330 W. Broadway, Suite 750
San Diego, CA 92101
14 Telephone: (619) 685-6531

15 JAMES P. WILLET
District Attorney of San Joaquin County
16 DAVID J. IREY, SBN 142864
Supervising Deputy District Attorney
17 BRENDA M. VILLALPANDO, SBN 258976
Deputy District Attorney
18 343 East Main Street, Suite 400
Stockton, CA 95202
19 Telephone: (209) 468-2400
20

21 JAMES P. FOX
District Attorney of San Mateo County
22 ELIZABETH M. HILL, SBN 212234
Deputy District Attorney
23 400 County Center, 3rd Floor
Redwood City, CA 94063
24 Telephone: (650) 363-4002
25
26
27
28

1 DOLORES A. CARR
District Attorney of Santa Clara County
2 KENNETH ROSENBLATT, SBN 104847
Supervising Deputy District Attorney
3 MATT HARRIS, SBN 136462
NAHAL IRAVANI-SANI, SBN 169372
4 TINA NUNES OBER, SBN 162750
Deputy District Attorneys
5 County Government Center, West Wing
70 W. Hedding Street
6 San Jose, CA 95110
Telephone: (408) 792-2572
7

8 DAVID W. PAULSON
District Attorney of Solano County
9 LINDSAY D. HORVATH, SBN 241273
Deputy District Attorney
10 Consumer and Environmental Crimes Unit
675 Texas Street, Suite 4500
11 Fairfield, CA 94533-6340
Telephone: (707) 784-6859
12

13 BIRGIT A. FLADAGER
District Attorney of Stanislaus County
14 MATTHEW C. MACLEAR, SBN 209228
Deputy District Attorney
15 832 12th Street, Suite 300
Modesto, CA 95354
16 Telephone: (209) 525-5550

17 GREGORY D. TOTTEN
District Attorney of Ventura County
18 MITCHELL F. DISNEY, SBN 138114
Senior Deputy District Attorney
19 Consumer and Environmental Protection Division
5720 Ralston Street, Suite 300
20 Ventura, CA 93003
Telephone: (805) 662-1750
21

JEFF W. REISIG
22 District Attorney of Yolo County
LARRY BARLLY, SBN 114456
23 Supervising Deputy District Attorney
Consumer Fraud and Environmental Protection Division
24 301 Second Street
Woodland, CA 95695
25 Telephone: (530) 666-8180
26
27
28

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

3 **PLAINTIFF**

4 1. Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA ("Plaintiff"), brings this
5 action by and through Edmund G. Brown Jr., Attorney General of the State of California
6 ("Attorney General"), Timothy R. Patterson, Supervising Deputy Attorney General, Ann Rushton
7 and Brett J. Morris, Deputy Attorneys General; Thomas J. Orloff, District Attorney for Alameda
8 County, Kenneth A. Mifsud and Michael J. Roemer, Deputy District Attorneys; Robert J. Kochly,
9 District Attorney for County of Contra Costa, Lauren R. Wixson, Deputy District Attorney;
10 Elizabeth A. Egan, District Attorney for Fresno County, Michael Brummel, Deputy District
11 Attorney; Paul V. Gallegos, District Attorney for County of Humboldt, Matthew C. Maclear,
12 Deputy District Attorney; Ronald Calhoun, District Attorney for County of Kings; Matthew C.
13 Maclear, Deputy District Attorney; Rockard J. Delgadillo, City Attorney for the City of Los
14 Angeles, Vaughn G. Minassian, Deputy City Attorney; Steve Cooley, District Attorney for the
15 County of Los Angeles, Daniel Wright, Deputy District Attorney; Larry D. Morse, District
16 Attorney for County of Merced, Matthew C. Maclear, Deputy District Attorney; Dean D. Flippo,
17 Monterey County District Attorney, Anne M. Michaels, Managing Deputy District Attorney and
18 Dije Ndreu, Deputy District Attorney; Tony Rackauckas, District Attorney of Orange County,
19 William G. Fallon, Deputy District Attorney; Rod Pacheco, District Attorney of Riverside
20 County, Stephanie Weissman, Supervising Deputy District Attorney and Dale C. Hoy, Deputy
21 District Attorney; Jan Scully, District Attorney for Sacramento County, Jane Crue, Deputy
22 District Attorney; Michael A. Ramos, District Attorney for County of San Bernardino, R. Glenn
23 Yabuno, Lead Deputy District Attorney; Bonnie M. Dumanis, District Attorney for San Diego
24 County, Karen I. Doty and James Waters, Deputy District Attorneys; James P. Willett, District
25 Attorney for the County of San Joaquin, David J. Irej, Supervising Deputy District Attorney and
26 Brenda M. Villalpando, Deputy District Attorney; James P. Fox, District Attorney for the County
27 of San Mateo, Elizabeth M. Hill, Deputy District Attorney; Dolores A. Carr, District Attorney for
28 the County of Santa Clara, Kenneth Rosenblatt, Supervising Deputy District, Matt Harris, Nahal

1 Iravani-Sani, and Tina Nunes Ober, Deputy District Attorneys; David W. Paulson, District
2 Attorney for the County of Solano, Lindsay D. Horvath, Deputy District Attorney; Birgit A.
3 Fladager, District Attorney for County of Stanislaus, Matthew C. Maclear, Deputy District
4 Attorney; Gregory Totten, District Attorney for the County of Ventura, Mitchell F. Disney,
5 Senior Deputy District Attorney; and Jeff W. Reisig, District Attorney for Yolo County, Larry
6 Barlly, Supervising Deputy District Attorney (collectively "Local Prosecutors").

7 2. Pursuant to California Health and Safety Code sections 25145.4 and 25182, the
8 Attorney General and the Local Prosecutors may bring a civil action in the name of the People of
9 the State of California to enjoin any violation of Chapter 6.5 of Division 20 of the California
10 Health and Safety Code ("Chapter 6.5") and to seek civil penalties for violations of Chapter 6.5.

11 3. Pursuant to California Health and Safety Code sections 25516 and 25516.1, the Local
12 Prosecutors and the Attorney General, respectively, may bring a civil action in the name of the
13 People of the State of California to enjoin any violation of California Health and Safety Code
14 sections 25503.5 and 25505, inclusive, and/or sections 25508 to 25520, inclusive.

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

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

23 DEFENDANTS

24 6. Defendant Target Corporation ("Target") is now, and at all times mentioned in this
25 Complaint was, a Minnesota corporation which does and did business in its own capacity and/or
26 through affiliates in the State of California at retail stores and distribution centers identified in
27 Exhibit A, which is incorporated herein by reference (collectively referred to as "Covered
28 Facilities"). Target handled hazardous materials and hazardous wastes at Covered Facilities

1 throughout California, including one or more Covered Facility in each of the counties represented
2 by the Local Prosecutors herein.

3 7. Target is, and at all times relevant to the claims in this Complaint was, legally
4 responsible for compliance with the provisions of the California Health and Safety Code,
5 including, but not limited to, Chapters 6.5 and 6.95 of Division 20, and the corresponding
6 implementing regulations, in connection with Target's ownership and/or operation of the Covered
7 Facilities.

8 8. Target is a "person" as defined in California Health and Safety Code section 25118.
9 Target is a "business" as defined in California Health and Safety Code section 25501, subdivision
10 (d).

11 9. In this Complaint when reference is made to any act or omission of Target, such
12 allegations shall include the acts and omissions of owners, officers, directors, agents, employees,
13 contractors, vendors, affiliates, and/or representatives of Target while acting within the course
14 and scope of their employment or agency on behalf of Target.

15 10. The identities of DOES 1-25 are unknown to Plaintiff at this time. At such time as
16 the identities of DOE defendants become known, Plaintiff will amend this Complaint
17 accordingly. DOES 1-25 are, and at all times relevant to the claims in this Complaint were,
18 legally responsible for compliance with the provisions of the California Health and Safety Code,
19 including, but not limited to, Chapters 6.5 and 6.95 of Division 20, and the corresponding
20 implementing regulations, in connection with the ownership and/or operation of the Covered
21 Facilities. Target and DOES 1-25 are collectively referred to herein as "Defendants."

22 11. At all times relevant hereto, DOES 1-10 were in a position of responsibility allowing
23 them to influence corporate policies or activities with respect to Target's compliance with
24 California environmental laws and regulations at the Covered Facilities, and had, by reason of
25 their position in the corporation, responsibility and authority either to prevent in the first instance,
26 or promptly to correct, the violations complained of herein, but failed to do so. In addition to any
27 direct personal liability of these individuals, DOES 1-10 also are personally liable under the

28 ///

1 “responsible corporate officer doctrine” for violations of law committed by Target as alleged
2 herein.

3 JURISDICTION AND VENUE

4 12. Venue is proper in this county pursuant to California Health and Safety Code sections
5 25183 and 25516, in that the violations alleged in this Complaint occurred in the County of
6 Alameda and throughout the State of California. This court has jurisdiction pursuant to Article 6,
7 section 10 of the California Constitution and section 393 of the Code of Civil Procedure.

8 13. Plaintiff and Target have entered into a series of agreements to toll any applicable
9 statutes of limitation. As a result of those agreements, a total of 820 days (the “Tolling Period”)
10 will not be included in computing the time limited by any statutes of limitation applicable to the
11 causes of action brought against Target based on claims covered by the tolling agreement. Those
12 claims include the claims alleged in this action against Target.

13 STATUTORY AND REGULATORY BACKGROUND

14 14. The State of California has enacted a comprehensive statutory and regulatory
15 framework governing the generation, handling, treatment, storage, transportation, and disposal of
16 hazardous waste. This framework, contained in Chapter 6.5 of Division 20 of the Health and
17 Safety Code section 25100 et seq. (“Chapter 6.5”) and its implementing regulations, which are
18 found at Title 22 of the California Code of Regulations section 66260.1 et seq., mandates a
19 “cradle to grave” system known as the Hazardous Waste Control Law (“HWCL”). The HWCL
20 system is maintained to record the generation, registration, tracking, storage, treatment, and
21 disposal of hazardous waste and to provide for the protection of the public and the environment
22 from the potential risks posed by hazardous waste.

23 15. The State of California has enacted a comprehensive statutory and regulatory
24 framework for the notification, handling, training and spill/release reporting of hazardous
25 materials. This framework is contained in Chapter 6.95 of the Health and Safety Code section
26 25500 et seq. (“Chapter 6.95”) and its implementing regulations, known as the Hazardous
27 Materials Release Response Plans and Inventory Law. In order to better inform the public and to
28 assist emergency responders, Chapter 6.95 has, for over twenty (20) years, mandated that basic

1 information on the location, type, quantity, and the health risks of hazardous materials handled,
2 used, stored, or disposed of in the State, which could be accidentally released into the
3 environment be made available to firefighters, health officials, planners, public safety officers,
4 health care providers, regulatory agencies and other interested persons.

5 **ENFORCEMENT AUTHORITY UNDER THE HWCL AND CHAPTER 6.95**

6 16. Section 25189 of the Health and Safety Code provides for civil liability for any
7 negligent or intentional violation of the HWCL, or for any violation of any permit, rule,
8 regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section
9 25189.2 of the Health and Safety Code is an alternative strict liability provision, which provides
10 for civil liability for any violation of the HWCL, or for any violation of any permit, rule,
11 regulation, standard, or requirement issued or promulgated pursuant to the HWCL.

12 17. The HWCL, pursuant to Health and Safety Code sections 25145.4, 25181 and 25184,
13 authorizes the Court to issue an order that enjoins any ongoing or potential violation of the
14 HWCL, or any applicable rule, regulation, permit, standard, requirement, or order issued or
15 promulgated pursuant to the HWCL.

16 18. Health and Safety Code section 25184 provides that in civil actions brought pursuant
17 to the HWCL in which an injunction or temporary restraining order is sought, it shall not be
18 necessary to allege or prove at any stage of the proceeding that irreparable damage will occur
19 should the temporary restraining order, preliminary injunction, or permanent injunction not be
20 issued; or that the remedy at law is inadequate, and the temporary restraining order, preliminary
21 injunction, or permanent injunction shall issue without such allegations and without such proof.

22 19. Section 25514 of the Health and Safety Code provides for civil liability for violations
23 of Chapter 6.95.

24 20. Chapter 6.95, pursuant to Health and Safety Code sections 25516, 25516.1 and
25 25516.2, authorizes the Court to issue an order that enjoins any ongoing or potential violation of
26 Chapter 6.95.

27 21. Health and Safety Code section 25516.2 provides that in civil actions brought
28 pursuant to Chapter 6.95 in which an injunction or temporary restraining order is sought, it is not

1 necessary to allege or prove at any stage of the proceeding that irreparable damage will occur
2 should the temporary restraining order, preliminary injunction, or permanent injunction not be
3 issued; or that the remedy at law is inadequate, and the temporary restraining order, preliminary
4 injunction, or permanent injunction shall issue without such allegations and without such proof.

5 **GENERAL ALLEGATIONS**

6 22. At all times relevant hereto and continuing from and after the date of filing of this
7 Complaint, Defendants owned and/or operated, and continue to own and/or operate, over 180
8 Covered Facilities throughout California, including retail stores and regional distribution centers.
9 Defendants, and each of them, handle at the Covered Facilities enormous volumes of hazardous
10 materials, including but not limited to, bleaches, pool chlorine and acids, pesticides, fertilizers,
11 paints and varnishes, lamp oil and other ignitable liquids, aerosol products, oven cleaners and
12 various other cleaning agents, automotive products and solvents, and other flammable and
13 corrosive materials. Most of those hazardous materials are sold to the public in the ordinary
14 course of business. However, at all times relevant hereto and continuing from and after the date
15 of filing of this Complaint, hazardous materials handled by Defendants at the Covered Facilities
16 were and are rendered unsalable and unusable for their intended purpose as the result of spillage,
17 expiration of sell-by dates, contamination, damage to containers or labeling, and other causes, and
18 must be handled and disposed of as hazardous waste in compliance with the HWCL.

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

27 ///

28 ///

1 24. Plaintiff is informed and believes, and thereupon alleges, that at all times relevant to
2 this Complaint each of the Covered Facilities generated hazardous waste during every ninety (90)
3 day period.

4 25. Examples of acts and/or omissions committed by Defendants which constitute
5 violations of California environmental laws and regulations are listed in the subparagraphs below.
6 These instances of violations of California law are not an exhaustive list of violations but are
7 alleged herein by way of examples of past, ongoing and persistent violations:

8 a. On May 27, 2009, Defendants, at a Covered Facility in Monterey County,
9 disposed ignitable aerosol wastes, regulated electronic waste ("e-waste"), mercury-containing
10 light bulbs, and other hazardous waste into a trash compactor for transportation by a garbage
11 hauler not registered to transport hazardous waste, and bound for a point not authorized to receive
12 hazardous waste, e-waste, or universal waste.

13 b. On May 21, 2009, Defendants, at a Covered Facility in Alameda County,
14 disposed ignitable aerosol wastes, canisters of propane, e-waste, mercury-containing light bulbs,
15 corrosive spray cleaners, medical waste, and other hazardous waste into a trash compactor for
16 transportation by a garbage hauler not registered to transport hazardous waste, and bound for a
17 point not authorized to receive hazardous waste, e-waste, or universal waste.

18 c. On May 14, 2009, Defendants, at a Covered Facility in Alameda County,
19 disposed ignitable aerosol waste, e-waste, and other hazardous waste into a trash compactor for
20 transportation by a garbage hauler not registered to transport hazardous waste, and bound for a
21 point not authorized to receive hazardous waste or e-waste.

22 d. On March 9, 2009, Defendants, at a Covered Facility in San Bernardino
23 County, disposed ignitable aerosol waste, a photo processing unit with liquid contents which
24 according to the label are hazardous to human health or the environment, along with e-waste and
25 universal waste, into a trash compactor for transportation by a garbage hauler not registered to
26 transport hazardous waste, and bound for the Mid-Valley Landfill in Fontana, San Bernardino
27 County, which is a point not authorized to receive hazardous waste, e-waste, or universal waste.

28 ///

1 e. On February 25, 2009, Defendants, at a Covered Facility in Yolo County,
2 disposed ignitable aerosol and explosive waste, and over 300 pounds of e-waste, into a trash
3 compactor for transportation by a garbage hauler not registered to transport hazardous waste, and
4 bound for the Yolo County Landfill in Woodland, which is a point not authorized to receive
5 hazardous waste, e-waste, or universal waste.

6 f. On February 4, 2009, Defendants, at a Covered Facility in Yolo County,
7 disposed ignitable aerosol waste and other hazardous waste, into a trash compactor for
8 transportation by a garbage hauler not registered to transport hazardous waste, and bound for the
9 Yolo County Landfill in Woodland, which is a point not authorized to receive hazardous waste or
10 universal waste.

11 g. In December 2008, a Target employee at a Covered Facility in San Joaquin
12 County admitted to county inspectors that hazardous waste, including waste pesticides, were
13 routinely disposed of into a trash compactor at the Covered Facility, which is a point not
14 authorized to receive hazardous waste.

15 h. On July 28, 2008, Defendants, at a covered facility in Riverside County,
16 disposed of 20 pounds of explosive/flammable waste into a trash compactor for transportation by
17 a garbage hauler not registered to transport hazardous waste, and bound for a Riverside County
18 landfill in Riverside, which is a point not authorized to receive hazardous waste.

19 i. In January 2008, Defendants, at a Covered Facility in Los Angeles County,
20 caused the transportation of several tons of hazardous waste, including 2,300 pounds of
21 flammable, toxic, or corrosive wastes and 2,250 pounds of aerosol wastes, to representatives of a
22 regional food bank, which is a point not authorized to receive hazardous waste or universal waste.

23 j. In March 2002, containers of liquid pool chlorine were disposed of by a Target
24 employee into a trash compactor at a Covered Facility in Sacramento County, which is a point not
25 authorized to receive hazardous waste. The liquid pool chlorine reacted with other incompatible
26 materials in the trash compactor, resulting in a release of irritating fumes that led to evacuation of
27 the Covered Facility, an emergency response, and several individuals transported to local
28 hospitals.

1 26. Plaintiff alleges that Defendants, and each of them, at all times relevant hereto and
2 continuing from and after the date of filing of this Complaint, caused and/or performed each of
3 the acts and/or omissions in violation of California law in the ownership and/or operation of the
4 Covered Facilities as alleged below:

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

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

11 c. Disposed, or caused the disposal of, hazardous waste at a point not authorized,
12 in violation of Health and Safety Code section 25189;

13 d. Stored hazardous waste onsite beyond the time permitted by law at a facility
14 which did not have a hazardous waste storage permit from the California Department of Toxic
15 Substances Control ("DTSC"), in violation of Title 22 of the California Code of Regulations
16 section 66262.34, and California Health and Safety Code section 25123.3, subdivision (h);

17 e. Failed to obtain and keep current all required hazardous waste generator
18 permits required by county and local ordinances;

19 f. Failed to comply with employee training obligations as set forth in Title 22 of
20 the California Code of Regulations section 66265.16, pertaining to the handling of hazardous
21 waste, including but not limited to the requirements to maintain, for a period of three (3) years,
22 training documentation for each employee involved in the handling of hazardous waste;

23 g. Treated, stored, disposed of, transported, and offered for transportation,
24 hazardous waste without having received and used a proper identification number from the U.S.
25 Environmental Protection Agency or DTSC for the originating facility, in violation of Title 22 of
26 the California Code of Regulations section 66262.12, subdivision (a);

27 h. Failed to determine if a generated waste was a "hazardous waste" as required
28 by Title 22 of the California Code of Regulations section 66262.11, and, where such waste was

1 hazardous, failed to handle the hazardous waste in accordance with the requirements of Chapter
2 6.5 of the Health and Safety Code and its implementing regulations in Title 22 of the California
3 Code of Regulations, including but not limited to section 66265.172 (compatible contents), and
4 section 66265.177 (placing incompatible waste streams in the same container);

5 i. Failed to properly label containers of accumulated hazardous waste, in violation
6 of Title 22 of the California Code of Regulations section 66262.34, subdivision (f);

7 j. Failed to keep containers of hazardous waste closed, except when removing or
8 adding hazardous waste, in violation of Title 22 of the California Code of Regulations section
9 66265.173;

10 k. Failed to retain copies of all consolidated hazardous waste manifests for three
11 years, in violation of Health and Safety Code section 25160.2, subdivision (b)(3), and Title 22 of
12 the California Code of Regulations section 66262.40, subdivision (a). As used in this paragraph
13 "manifest" means a shipping document originated and signed by a generator of hazardous waste
14 that contains all of the information required by law and that complies with all applicable federal
15 and state regulations, and includes but is not limited to, receipts;

16 l. Failed to at all times have in place a hazardous waste contingency plan and
17 emergency procedures for each Covered Facility in the State of California, in violation of Title 22
18 of the California Code of Regulations sections 66265.51 through 66265.56;

19 m. Failed to maintain and operate the Covered Facilities so as to minimize the
20 possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous
21 waste or hazardous waste constituents to air, soil or surface water which could threaten human
22 health or the environment, in violation of Title 22 of the California Code of Regulations section
23 66265.31;

24 n. Failed to maintain containers holding hazardous waste at the Covered Facilities
25 so as to prevent leaks, in violation of Title 22 of the California Code of Regulations section
26 66265.173;

27 ///

28 ///

1 o. Failed to conduct weekly inspections of hazardous waste storage areas at the
2 Covered Facilities, in violation of Title 22 of the California Code of Regulations section
3 66264.174.

4 p. Failed to determine if hazardous waste had to be treated before it could be land
5 disposed by testing the waste or using knowledge of the waste, in violation of Title 22 of the
6 California Code of Regulations section 66268.7, subdivision (a);

7 q. Failed to submit to DTSC a legible copy of each manifest used within thirty
8 (30) days of each shipment of hazardous waste off-site or into California, in violation of Title 22
9 of the California Code of Regulations section 66262.23, subdivision (a)(4);

10 r. Failed to keep a copy of each manifest signed in accordance with Title 22 of the
11 California Code of Regulations section 66262.23, subdivision (a), for three (3) years or until the
12 generator received a signed copy from the designated facility which received the hazardous
13 waste, in violation of Title 22 of the California Code of Regulations section 66262.40,
14 subdivision (a);

15 s. Failed to contact the transporter and/or the owner or operator of the designated
16 facility which was to receive the hazardous waste to determine the status of the hazardous waste
17 after the generator did not receive a copy of the manifest with the handwritten signature of the
18 owner or operator of the designated facility within 35 days of the date the waste was accepted by
19 the initial transporter, in violation of Title 22 of the California Code of Regulations section
20 66262.42;

21 t. Failed to submit an Exception Report to DTSC after the generator did not
22 receive a copy of the manifest with the handwritten signature of the owner or operator of the
23 designated facility which was to receive the hazardous waste within forty-five (45) days of the
24 date the waste was accepted by the initial transporter, in violation of Title 22 of the California
25 Code of Regulations section 66262.42, subdivision (b);

26 u. Failed to comply with the requirements of Title 40 of the Code of Federal
27 Regulations section 262.34, subdivisions (d) – (f), requiring generators to designate an employee
28 at all times as the emergency coordinator and post the required information listed on Section

1 262.34, subdivision (d)(5)(i) - (iv), in violation of Title 22 of the California Code of Regulations
2 section 66262.34, subdivision (d)(2);

3 v. Failed to properly manage, mark, and store hazardous waste aerosol cans, in
4 violation of section 25201.16 of the California Health and Safety Code;

5 w. Failed to properly manage, mark, and store universal waste, in violation of Title
6 22 of the California Code of Regulations sections 66273.13 - 66273.16 (repealer filed 2-4-2009)
7 and sections 66273.33 - 66273.36;

8 x. Failed to keep a record with the information required by section 66273.39,
9 subdivision (a)(1) - (3), of each shipment of universal waste received at the universal waste
10 handler's facility, in violation of Title 22 of the California Code of Regulations section 66273.39;

11 y. Failed to implement, maintain and comply with, an employee training program
12 meeting the requirements of Health and Safety Code section 25504, subdivisions (a) and (c), and
13 Title 19 of the California Code of Regulations section 2732, pertaining to hazardous materials,
14 and business and area plans;

15 z. Failed to implement and maintain a business emergency plan for emergency
16 response to a release or threatened release of hazardous materials, in violation of Health and
17 Safety Code section 25503.5;

18 aa. Failed to implement, maintain or to submit to the administering agency (as
19 defined in Health and Safety Code sections 25501 and 25502), a complete hazardous materials
20 business plan for each Covered Facility, in violation of Health and Safety Code sections 25504
21 and 25505 and Title 19 of the California Code of Regulations section 2729;

22 bb. Failed to comply with the California Medical Waste Management Act, Health
23 and Safety Code section 117600 et seq., by improperly storing, transporting, and disposing of
24 pharmaceutical wastes; and,

25 cc. Failed to prevent the dilution of a restricted waste, or the residual from
26 treatment of a restricted waste, as a substitute for adequate treatment to achieve compliance with
27 Article 3 or Article 10 of Chapter 18 of Title 22 of the California Code of Regulations, or to

28 ///

1 circumvent a land disposal prohibition imposed by 42 U.S.C. section 6924, in violation of Title
2 22 of the California Code of Regulations section 66268.3.

3 27. Pursuant to California Code of Civil Procedure section 128.7(b)(3), Plaintiff alleges
4 that the allegations set forth in Paragraph 26 of this Complaint are likely to have additional
5 evidentiary support after a reasonable opportunity for further investigation or discovery.

6 28. Each of the acts and/or omissions pleaded in Paragraph 26 of this Complaint is part of
7 a continuing course of conduct by Defendant Target to violate California environmental laws and
8 regulations, such that the statutes of limitation have not yet begun to run on said acts.

9 **FIRST CAUSE OF ACTION**

10 **(Intentional Disposal of Hazardous Waste at a Point Not Authorized;**

11 **Against all Defendants)**

12 **(Health & Safety Code § 25189, subd. (c))**

13 29. Plaintiff realleges paragraphs 1 through 25, 26c., and 27 through 28, inclusive.

14 30. Health and Safety Code section 25189, subdivision (c), prohibits the intentional
15 disposal of hazardous waste at an unauthorized point.

16 31. Defendants, and each of them, have intentionally disposed or caused the disposal of
17 hazardous waste originating from the Covered Facilities at unauthorized points, in violation of
18 California Health and Safety Code section 25189, subdivision (c), and unless enjoined by order of
19 the Court, Defendants, and each of them, may or will continue in the course of conduct as alleged
20 herein.

21 32. Each intentional disposal of hazardous waste at an unauthorized point discovered
22 within five years of commencing this action, exclusive of any applicable tolling periods and those
23 set forth in paragraph 13 herein, subjects Defendants, and each of them, to a separate and
24 additional civil penalty under Health and Safety Code section 25189, subdivision (c).

25 33. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
26 of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and
27 each of them, under Health and Safety Code section 25189, subdivision (c) as set forth in
28 Plaintiff's prayer for relief.

1 **SECOND CAUSE OF ACTION**

2 **(Negligent Disposal of Hazardous Waste at a Point Not Authorized;**

3 **Against all Defendants)**

4 **(Health & Safety Code § 25189, subd. (d))**

5 34. Plaintiff realleges paragraphs 1 through 25, 26c., and 27 through 28, inclusive.

6 35. Health and Safety Code section 25189, subdivision (d), prohibits the negligent
7 disposal of hazardous waste at an unauthorized point.

8 36. Defendants, and each of them, have negligently disposed or caused the disposal of
9 hazardous waste from the Covered Facilities at unauthorized points in violation of California
10 Health and Safety Code section 25189, subdivision (d), and unless enjoined by order of the Court,
11 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

12 37. Each negligent disposal of hazardous waste at an unauthorized point discovered
13 within five years of commencing this action, exclusive of any applicable tolling periods and those
14 set forth in paragraph 13 herein, subjects Defendants, and each of them, to a separate and
15 additional civil penalty under Health and Safety Code section 25189, subdivision (d).

16 38. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
17 of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and
18 each of them, under Health and Safety Code section 25189, subdivision (d), as set forth in
19 Plaintiff's prayer for relief.

20 **THIRD CAUSE OF ACTION**

21 **(Strict Liability for Disposal of Hazardous Waste at a Point Not Authorized;**

22 **Against all Defendants)**

23 **(Health & Safety Code, § 25189.2, subd. (c))**

24 39. Plaintiff realleges paragraphs 1 through 25, 26c., and 27 through 28, inclusive.

25 40. Health and Safety Code sections 25189.2, subdivision (c), prohibits the disposal of
26 hazardous waste at an unauthorized point.

27 41. Defendants, and each of them, have disposed or caused the disposal of hazardous
28 waste from the Covered Facilities at unauthorized points, in violation of California Health and

1 Safety Code section 25189.2, subdivision (c), and unless enjoined by order of the Court,
2 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

3 42. Each disposal of hazardous waste at an unauthorized point discovered within five
4 years of commencing this action, exclusive of any applicable tolling periods and those set forth in
5 paragraph 13 herein, subjects Defendants, and each of them, to a separate and additional civil
6 penalty under Health and Safety Code section 25189.2, subdivision (c).

7 43. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
8 of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and
9 each of them, under Health and Safety Code section 25189.2, subdivision (c), as set forth in
10 Plaintiff's prayer for relief.

11 **FOURTH CAUSE OF ACTION**

12 **(Intentional Unauthorized Transportation of Hazardous Waste;**

13 **Against all Defendants)**

14 **(Health & Safety Code, §§ 25163 and 25189, subd. (b);**

15 **Cal. Code Regs., Tit. 22, § 66263.23)**

16 44. Plaintiff realleges paragraphs 1 through 25, 26a., 26b., and 27 through 28, inclusive.

17 45. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized transportation
18 of hazardous waste. Section 25163 prohibits the transportation of hazardous waste without a
19 valid registration from DTSC. Title 22 of the California Code of Regulations section 66263.23,
20 subdivision (b), prohibits the transportation of hazardous waste to a location not permitted or
21 otherwise authorized by DTSC to receive the waste.

22 46. Defendants, and each of them, intentionally engaged in the transportation of
23 hazardous waste without a valid registration from DTSC from the Covered Facilities to
24 unauthorized locations, in violation of Health and Safety Code section 25163 and Title 22 of the
25 California Code of Regulations section 66263.23, and unless enjoined by order of the Court,
26 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

27 47. Each act of unauthorized transportation discovered within five years of commencing
28 this action, exclusive of any applicable tolling periods and those set forth in paragraph 13 herein,

1 subjects Defendants, and each of them, to a separate and additional civil penalty under Health and
2 Safety Code section 25189, subdivision (b), for each intentional violation of Health and Safety
3 Code section 25163 and Title 22 of the California Code of Regulations section 66263.23.

4 48. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
5 of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and
6 each of them, under Health and Safety Code section 25189, subdivision (b), for each intentional
7 violation of Health and Safety Code section 25163 and Title 22 of the California Code of
8 Regulations section 66263.23, as set forth in Plaintiff's prayer for relief.

9 **FIFTH CAUSE OF ACTION**

10 **(Negligent Unauthorized Transportation of Hazardous Waste;**

11 **Against all Defendants)**

12 **(Health & Safety Code, §§ 25163 and 25189, subd. (b);**

13 **Cal. Code Regs., Tit. 22, § 66263.23)**

14 49. Plaintiff realleges paragraphs 1 through 25, 26a., 26b., and 27 through 28, inclusive.

15 50. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized transportation
16 of hazardous waste. Section 25163 prohibits the transportation of hazardous waste without a
17 valid registration from DTSC. Title 22 of the California Code of Regulations section 66263.23,
18 subdivision (b), prohibits the transportation of hazardous waste to a location not permitted or
19 otherwise authorized by DTSC to receive the waste.

20 51. Defendants, and each of them, have negligently engaged in the transportation of
21 hazardous waste without a valid registration from DTSC, from the Covered Facilities to
22 unauthorized locations, in violation of Health and Safety Code section 25163 and Title 22 of the
23 California Code of Regulations section 66263.23, and 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 52. Each act of unauthorized transportation discovered within five years of commencing
26 this action, exclusive of any applicable tolling periods and those set forth in paragraph 13 herein,
27 subjects Defendants, and each of them, to a separate and additional civil penalty under Health and

28 ///

1 Safety Code section 25189, subdivision (b), for each negligent violation of Health and Safety
2 Code section 25163 and Title 22 of the California Code of Regulations section 66263.23.

3 53. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
4 of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and
5 each of them, under Health and Safety Code section 25189, subdivision (b), for each negligent
6 violation of Health and Safety Code section 25163 and Title 22 of the California Code of
7 Regulations section 66263.23, as set forth in Plaintiff's prayer for relief.

8 **SIXTH CAUSE OF ACTION**

9 **(Strict Liability for Unauthorized Transportation of Hazardous Waste;**

10 **Against all Defendants)**

11 **(Health & Safety Code, §§ 25163 and 25189.2, subd. (b);**

12 **Cal. Code Regs., Tit. 22, § 66263.23)**

13 54. Plaintiff realleges paragraphs 1 through 25, 26a., 26b., and 27 through 28, inclusive.

14 55. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized transportation
15 of hazardous waste. Section 25163 prohibits the transportation of hazardous waste without a
16 valid registration from DTSC. Title 22 of the California Code of Regulations section 66263.23,
17 subdivision (b), prohibits the transportation of hazardous waste to a location not permitted or
18 otherwise authorized by DTSC to receive the waste.

19 56. Defendants, and each of them, have engaged in the transportation of hazardous waste
20 without a valid registration from DTSC from the Covered Facilities to unauthorized locations, in
21 violation of Health and Safety Code section 25163 and Title 22 of the California Code of
22 Regulations section 66263.23, and unless enjoined by order of the Court, Defendants, and each of
23 them, may or will continue in the course of conduct as alleged herein.

24 57. Each act of unauthorized transportation discovered within five years of commencing
25 this action, exclusive of any applicable tolling periods and those set forth in paragraph 13 herein,
26 subjects Defendants, and each of them, to a separate and additional civil penalty under Health and
27 Safety Code section 25189, subdivision (b), for each intentional violation of Health and Safety
28 Code section 25163 and Title 22 of the California Code of Regulations section 66263.23.

58. Based on the above, Plaintiff requests injunctive relief against Defendants, and each of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict liability violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23, as set forth in Plaintiff's prayer for relief.

SEVENTH CAUSE OF ACTION

**(Intentional Violations of Hazardous Waste Control Laws for
Hazardous Waste Handling, Training and Storage Requirements;
Against all Defendants)**

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b));

Cal. Code Regs., Tit. 22, § 66260.1, *et seq.*)

59. Plaintiff realleges Paragraphs 1 through 25, 26d. through 26x., and 27 through 28, inclusive.

60. Defendants, and each of them, have intentionally violated, and continue to violate, the hazardous waste handling, training and storage requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations section 66260.1 et seq., at the Covered Facilities, and unless enjoined by order of the Court, Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

61. Each intentional violation by Defendants, and each of them, of the hazardous waste handling, training, and storage requirements discovered within the five years of commencing this action, exclusive of any applicable tolling periods and those set forth in paragraph 13 herein, subjects Defendants, and each of them, to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

62. Based on the above, Plaintiff requests injunctive relief against Defendants, and each of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for each intentional violation of the hazardous waste handling, training and storage requirements of Chapter 6.5 of

1 Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations
2 at Title 22 of the California Code of Regulations section 66260.1 et seq., at the Covered
3 Facilities, as set forth in Plaintiff's prayer for relief.

4 **EIGHTH CAUSE OF ACTION**

5 **(Negligent Violations of Hazardous Waste Control Laws for**
6 **Hazardous Waste Handling, Training and Storage Requirements;**

7 **Against all Defendants)**

8 **(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b);**

9 **Cal. Code Regs., Tit. 22, § 66260.1, et seq.)**

10 63. Plaintiff realleges Paragraphs 1 through 25, 26d. through 26x., and 27 through 28,
11 inclusive.

12 64. Defendants, and each of them, have negligently violated and continue to violate the
13 hazardous waste handling, training and storage requirements of Chapter 6.5 of Division 20 of the
14 Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the
15 California Code of Regulations section 66260.1 et seq., at the Covered Facilities, and unless
16 enjoined by order of the Court, Defendants, and each of them, may or will continue in the course
17 of conduct as alleged herein.

18 65. Each negligent violation by Defendants, and each of them, of the hazardous waste
19 handling, training, and storage requirements discovered within the five years of commencing this
20 action, exclusive of any applicable tolling periods and those set forth in paragraph 13 herein,
21 subjects Defendants, and each of them, to a separate and additional civil penalty under Health &
22 Safety Code section 25189, subdivision (b).

23 66. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
24 of them, under Health & Safety Code section 25181, and civil penalties against Defendants, and
25 each of them, under Health and Safety Code section 25189, subdivision (b), for each negligent
26 violation of the hazardous waste handling, training and storage requirements of Chapter 6.5 of
27 Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations

28 ///

1 at Title 22 of the California Code of Regulations section 66260.1 et seq., at the Covered
2 Facilities, as set forth in Plaintiff's prayer for relief.

3 **NINTH CAUSE OF ACTION**

4 **(Strict Liability for Violations of Hazardous Waste Control Laws for**
5 **Hazardous Waste Handling, Training and Storage Requirements;**
6 **Against all Defendants)**

7 **(Health & Safety Code, §§ 25100, et seq., and 25189.2, subd. (b);**

8 **Cal. Code Regs., Tit. 22, § 66260.1, et seq.)**

9 67. Plaintiff realleges Paragraphs 1 through 25, 26d. through 26x., and 27 through 28,
10 inclusive.

11 68. Defendants, and each of them, have violated and continue to violate the hazardous
12 waste handling, training and storage requirements of Chapter 6.5 of Division 20 of the Health and
13 Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California
14 Code of Regulations section 66260.1 et seq., at the Covered Facilities, and unless enjoined by
15 order of the Court, Defendants, and each of them, may or will continue in the course of conduct
16 as alleged herein.

17 69. Each violation by Defendants, and each of them, of the hazardous waste handling,
18 training, and storage requirements discovered within the five years of commencing this action,
19 exclusive of any applicable tolling periods and those set forth in paragraph 13 herein, subjects
20 Defendants, and each of them, to a separate and additional civil penalty under Health and Safety
21 Code section 25189.2, subdivision (b).

22 70. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
23 of them, under Health and Safety Code section 25181, and civil penalties against Defendants, and
24 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each violation
25 of the hazardous waste handling, training and storage requirements of Chapter 6.5 of Division 20
26 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22
27 of the California Code of Regulations section 66260.1 et seq., at the Covered Facilities, as set
28 forth in Plaintiff's prayer for relief.

1 **TENTH CAUSE OF ACTION**

2 **(Violations of Hazardous Materials Release Response Plans and Inventory Laws;**

3 **Against all Defendants)**

4 **(Health & Safety Code, §§ 25503.5, 25504, 25505 and 25514;**

5 **Cal. Code Regs., Tit. 19, § 2729)**

6 71. Plaintiff realleges Paragraphs 1 through 25, 26y. through 26aa., and 27 through 28,
7 inclusive.

8 72. Defendants, and each of them, failed to maintain the required hazardous materials
9 response plans and inventories required for the Covered Facilities pursuant to Chapter 6.95,
10 Division 20, of the Health and Safety Code, and unless enjoined by order of the Court,
11 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

12 73. Each violation by Defendants, and each of them, of California Health and Safety
13 Code sections 25503.5, 25504, 25505, and Title 19 of the California Code of Regulations section
14 2729, discovered within one year of commencing this action, exclusive of any applicable tolling
15 periods and those set forth in paragraph 13 herein, subjects Defendants, and each of them, to a
16 separate and additional civil penalty under Health and Safety Code section 25514.5, subdivision
17 (a), for each violation of Chapter 6.95.

18 74. Based on the above, Plaintiff requests injunctive relief against Defendants, and each
19 of them, under Health and Safety Code sections 25116 and 25516.2, and civil penalties against
20 Defendants, and each of them, under Health and Safety Code section 25514, subdivision (a), for
21 each violation of the required hazardous materials response plans and inventories and training and
22 updating requirements of Chapter 6.95 of Division 20 of the Health and Safety Code section
23 25500 et seq., and its implementing regulations, at the Covered Facilities, as set forth in
24 Plaintiff's prayer for relief.

25 ///

26 ///

27 ///

28 ///

ELEVENTH CAUSE OF ACTION

**(Knowing Violations of Hazardous Materials Release Response Plans
and Inventory Laws; Against all Defendants)**

(Health & Safety Code, §§ 25503.5, 25504, 25505 and 25514;

Cal. Code Regs., Tit. 19, § 2729)

75. Plaintiff realleges Paragraphs 1 through 25, 26y. through 26aa., and 27 through 28, inclusive.

76. Defendants, and each of them, knowingly failed to maintain the required hazardous materials response plans and inventories required for the Covered Facilities pursuant to Chapter 6.95, Division 20, of the Health and Safety Code, and unless enjoined by order of the Court, Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

77. Each knowing violation by Defendants, and each of them, of California Health and Safety Code sections 25503.5, 25504, 25505, and Title 19 of the California Code of Regulations section 2729, discovered within one year of commencing this action, exclusive of any applicable tolling periods and those set forth in paragraph 13 herein, subjects Defendants, and each of them, to a separate and additional civil penalty under Health and Safety Code section 25514.5(b) for each violation of Chapter 6.95.

78. Based on the above, Plaintiff requests injunctive relief against Defendants, and each of them, under Health and Safety Code sections 25116 and 25516.2, and civil penalties against Defendants, and each of them, under Health and Safety Code section 25514, subdivision (b), for each violation of the required hazardous materials response plans and inventories and training and updating requirements of Chapter 6.95 of Division 20 of the Health and Safety Code section 25500 et seq., and its implementing regulations, at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

TWELFTH CAUSE OF ACTION

(Violations of Unfair Competition Laws; Against all Defendants)

Bus. & Prof. Code §§ 17200 - 17208)

79. Plaintiff realleges paragraphs 1 through 78, inclusive.

1 3. A preliminary and permanent injunction, issued pursuant to Business and Professions
2 Code section 17203, prohibiting Defendants, and each of them, from engaging in activity that
3 violates the provisions of Chapter 6.5 and/or 6.95 of Division 20 of the Health and Safety Code,
4 Health and Safety Code section 117600 et seq., and county and local ordinances pertaining to
5 hazardous waste generator permits, as alleged in this Complaint, which thereby constitute unfair
6 competition within the meaning of Business and Professions Code section 17200;

7 4. Civil penalties against Defendants, and each of them, pursuant to Health and Safety
8 Code section 25189, subdivisions (b), (c) and (d), in an amount according to proof.

9 5. Civil penalties against Defendants, and each of them, pursuant to section Health and
10 Safety Code 25189.2, subdivision (b), in an amount according to proof;

11 6. Civil penalties against Defendants, and each of them, pursuant to Health and Safety
12 Code section 25514, subdivision (a), in an amount according to proof;

13 7. Civil penalties against Defendants, and each of them, pursuant to Health and Safety
14 Code section 25514, subdivision (b), in an amount according to proof;

15 8. Civil penalties against Defendants, and each of them, pursuant to Business and
16 Professions Code section 17206 for each act of unfair competition engaged in by Defendants, and
17 each of them, in an amount according to proof;

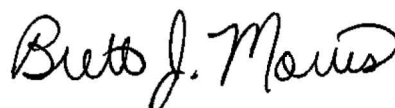
18 9. Plaintiff's costs of inspection, investigation, attorneys' fees, enforcement,
19 prosecution, and suit herein, including but not limited to such costs as are authorized for
20 reimbursement pursuant to Code of Civil Procedure section 1021.8; and,

21 10. Such other and further relief as the Court deems just and proper.

22 Dated: June 15, 2009

Respectfully Submitted,

EDMUND G. BROWN JR.
Attorney General of California



BRETT J. MORRIS
Deputy Attorney General
Attorneys for Plaintiff

1 Dated: June 15, 2009

THOMAS J. ORLOFF, District Attorney
County of Alameda, State of California



KENNETH A. MIFSUD
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

2
3
4
5
6 Dated: June 15, 2009

ROBERT J. KOCHLY, District Attorney
County of Contra Costa, State of California



LAUREN R. WIXSON
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

7
8
9
10
11
12 Dated: June 15, 2009

ELIZABETH A. EGAN, District Attorney
Fresno County, State of California



MICHAEL BRUMMEL
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

13
14
15
16
17 Dated: June 15, 2009

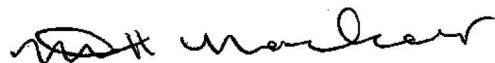
PAUL V. GALLEGOS, District Attorney
County of Humboldt, State of California



MATTHEW C. MACLEAR
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

18
19
20
21
22
23 Dated: June 15, 2009

RONALD CALHOUN, District Attorney
County of Kings, State of California



MATTHEW C. MACLEAR
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

1 Dated: June 15, 2009

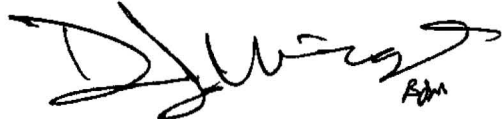
ROCKARD J. DELGADILLO, City
Attorney, City of Los Angeles



VAUGHN G. MINASSIAN
Deputy City Attorney
Attorneys for Plaintiff, People of the State
of California

6 Dated: June 15, 2009

STEVE COOLEY, District Attorney
County of Los Angeles, State of California



DANIEL J. WRIGHT
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

12 Dated: June 15, 2009

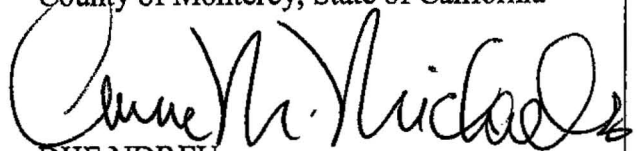
LARRY D. MORSE, District Attorney
County of Merced, State of California



MATTHEW C. MACLEAR
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

18 Dated: June 15, 2009

DEAN D. FLIPPO, District Attorney
County of Monterey, State of California



DIJE NDREU
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

24 Dated: June 15, 2009

TONY RACKAUCKAS, District Attorney
County of Orange, State of California



WILLIAM G. FALLON
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

1 Dated: June 15, 2009

ROD PACHECO, District Attorney
County of Riverside, State of California

2
3
4 

DALE C. HOY
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

5
6
7 Dated: June 15, 2009

JAN SCULLY, District Attorney
County of Sacramento, State of California

8
9
10 

JANE CRUE
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

11
12
13
14 Dated: June 15, 2009

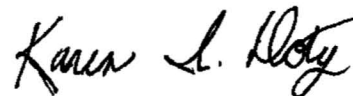
MICHAEL A. RAMOS, District Attorney
County of San Bernardino, State of
California

15
16
17 

R. GLENN YABUNO
Lead Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

18
19
20
21
22 Dated: June 15, 2009

BONNIE M. DUMANIS District Attorney
County of San Diego, State of California

23
24 

KAREN I. DOTY
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

1 Dated: June 14, 2009

JAMES P. WILLETT, District Attorney
County of San Joaquin, State of California

2
3
4
5 DAVID J. IREY
Supervising Deputy District Attorney
Attorneys for Plaintiff, People of the State
6 of California

7 Dated: June 15, 2009

JAMES P. FOX, District Attorney
County of San Mateo, State of California

8
9
10
11
12 ELIZABETH M. HILL
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

13 Dated: June 15, 2009

DOLORES A. CARR, District Attorney
County of Santa Clara, State of California

14
15
16
17
18 KENNETH ROSENBLATT
Supervising Deputy District Attorney
Attorneys for Plaintiff, People of the State
19 of California

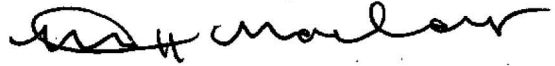
20
21 Dated: June 15, 2009

DAVID W. PAULSON, District Attorney
County of Solano, State of California

22
23
24
25 LINDSAY D. HORVATH
Deputy District Attorney
Attorneys for Plaintiff, People of the State
26 of California

1 Dated: June 15, 2009

BIRGIT A. FLADAGER, District Attorney
County of Stanislaus, State of California



MATTHEW C. MACLEAR
Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

8 Dated: June 12, 2009

GREGORY D. TOTTEN, District Attorney
County of Ventura, State of California



MITCHELL F. DISNEY
Senior Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

14 Dated: June 12, 2009

JEFF W. REISIG, District Attorney
County of Yolo, State of California



LARRY BARLLY
Supervising Deputy District Attorney
Attorneys for Plaintiff, People of the State
of California

20 SA2006900058
21 90117262.doc

EXHIBIT A

EXHIBIT A TO THE COMPLAINT - COVERED FACILITIES

STORE/DC Number	COUNTY	CITY	CATEGORY	STREET ADDRESS
T-1926	Alameda	Albany	Target Store	1057 Eastshore Hwy
T-0328	Alameda	Dublin	Target Store	7200 Amador Plaza Rd
T-1422	Alameda	Fremont	Target Store	39201 Fremont Blvd
T-1472	Alameda	Hayward	Target Store	2499 Whipple Rd
T-2185	Alameda	Hayward	Target Store	19661 Hesperian Blvd
T-0828	Alameda	Livermore	Target Store	4300 Las Positas Rd
T-1119	Alameda	Newark	Target Store	400 Newpark Mall
T-0327	Alameda	San Leandro	Target Store	15555 Hesperian Blvd
T-1428	Alameda	San Leandro	Target Store	15555 E 14th St Ste 400
T-0317	Butte	Chico	Target Store	1951 E 20th St
T-1819	Contra Costa	Antioch	Target Store	5769 Lone Tree Way
T-0697	Contra Costa	El Cerrito	Target Store	11450 San Pablo Ave
T-0737	Contra Costa	Pinole	Target Store	1400 Fitzgerald Dr
T-0332	Contra Costa	Pittsburg	Target Store	4301 Century Blvd
T-0330	Contra Costa	Pleasant Hill	Target Store	560 Contra Costa Blvd
T-1507	Contra Costa	Richmond	Target Store	4500 Macdonald Ave.
T-0949	Contra Costa	San Ramon	Target Store	2610 Bishop Dr
T-1208	Contra Costa	Walnut Creek	Target Store	1871 N Main St
T-2270	El Dorado	El Dorado Hills	Target Store	4400 Town Center Blvd
T-0358	Fresno	Clovis	Target Store	900 Shaw Ave
T-2018	Fresno	Clovis	Target Store	695 W Herndon Ave
T-0275	Fresno	Fresno	Target Store	3150 W Shaw Ave
T-0314	Fresno	Fresno	Target Store	3173 E Shields Ave
T-0911	Fresno	Fresno	Target Store	7600 N Blackstone Ave
T-1417	Fresno	Fresno	Target Store	5740 N Blackstone Ave
T-1421	Humboldt	Eureka	Target Store	2525 4th St
T-1816	Imperial	El Centro	Target Store	2295 N Imperial Ave
T-0316	Kern	Bakersfield	Target Store	1300 Wible Rd
T-0614	Kern	Bakersfield	Target Store	3401 Mall View Rd
T-1384	Kern	Bakersfield	Target Store	9100 Rosedale Hwy
T-0593	Kern	Shafter	Distribution Center	3880 Zachary Rd Ave.
T-1906	Kings	Hanford	Target Store	140 N 12th Ave
T-0184	Los Angeles	Alhambra	Target Store	2120 W Main St
T-1033	Los Angeles	Baldwin Park	Target Store	3100 Baldwin Park Blvd
T-1362	Los Angeles	Burbank	Target Store	1800 W Empire Ave
T-2143	Los Angeles	Canoga Park	Target Store	6700 Topanga Canyon Blvd
T-0295	Los Angeles	Carson	Target Store	651 W Sepulveda Blvd
T-2026	Los Angeles	Carson	Target Store	20700 S Avalon Blvd Suite 750
T-2328	Los Angeles	Carson	Target Store	651 W. Sepulveda Blvd
T-0289	Los Angeles	Cerritos	Target Store	20200 Bloomfield Ave
T-1305	Los Angeles	Cerritos	Target Store	11525 South St
T-2275	Los Angeles	Compton	Target Store	1621 South Alameda St.
T-0198	Los Angeles	Culver City	Target Store	10820 Jefferson Blvd
T-2179	Los Angeles	Diamond Bar	Target Store	747 Grand Ave
T-0302	Los Angeles	Duarte	Target Store	1050 Huntington Dr
T-0290	Los Angeles	Gardena	Target Store	2169 W Redondo Beach Blvd
T-2307	Los Angeles	Glendale	Target Store	2195 Glendale Galleria
T-0287	Los Angeles	Granada Hills	Target Store	17055 San Fernando Mission Blvd
T-2329	Los Angeles	Granada Hills	Target Store	11133 Balboa Blvd
T-2280	Los Angeles	Hawthorne	Target Store	2700 W. 120th St.
T-1329	Los Angeles	Inglewood	Target Store	3471 W Century Blvd
T-0226	Los Angeles	La Verne	Target Store	2462 Foothill Blvd

EXHIBIT A TO THE COMPLAINT - COVERED FACILITIES

STORE/DC Number	COUNTY	CITY	CATEGORY	STREET ADDRESS
T-1409	Los Angeles	Lakewood	Target Store	141 Lakewood Center Mall
T-0245	Los Angeles	Lancaster	Target Store	43525 10th St W
T-0195	Los Angeles	Long Beach	Target Store	2270 N Bellflower Blvd
T-0196	Los Angeles	Long Beach	Target Store	3705 E South St
T-0292	Los Angeles	Long Beach	Target Store	950 E 33rd St
T-0189	Los Angeles	Los Angeles	Target Store	5600 Whittier Blvd
T-1306	Los Angeles	Los Angeles	Target Store	3535 S La Cienega Blvd
T-1408	Los Angeles	Los Angeles	Target Store	2626 Colorado Blvd
T-0199	Los Angeles	Manhattan Beach	Target Store	1200 N Sepulveda Blvd
T-0294	Los Angeles	North Hollywood	Target Store	11051 Victory Blvd
T-0299	Los Angeles	Northridge	Target Store	8840 Corbin Ave
T-2020	Los Angeles	Northridge	Target Store	8999 Balboa Blvd
T-1340	Los Angeles	Norwalk	Target Store	10600 Firestone Blvd
T-1424	Los Angeles	Norwalk	Target Store	12051 Imperial Hwy
T-0183	Los Angeles	Pacoima	Target Store	9725 Laurel Canyon Blvd
T-0685	Los Angeles	Palmdale	Target Store	39440 10th St W
T-2350	Los Angeles	Palmdale	Target Store	38019 47th Street E.
T-0883	Los Angeles	Pasadena	Target Store	777 E Colorado Blvd
T-1332	Los Angeles	Pasadena	Target Store	3121 E Colorado Blvd
T-1425	Los Angeles	Pico Rivera	Target Store	8800 Whittier Blvd
T-1980	Los Angeles	Redondo Beach	Target Store	1601 Kingsdale Ave
T-1411	Los Angeles	Rosemead	Target Store	3600 Rosemead Blvd
T-0222	Los Angeles	Rowland Heights	Target Store	17751 Colima Rd
T-0767	Los Angeles	San Dimas	Target Store	888 W Arrow Hwy
T-0227	Los Angeles	Santa Fe Springs	Target Store	10621 Carmenita Rd
T-2319	Los Angeles	Signal Hill	Target Store	950 East 33rd St.
T-0190	Los Angeles	South Gate	Target Store	5700 Firestone Blvd
T-0200	Los Angeles	Torrance	Target Store	3433 Sepulveda Blvd
T-0257	Los Angeles	Valencia	Target Store	24425 Magic Mountain Pkwy
T-1307	Los Angeles	Van Nuys	Target Store	5711 Sepulveda Blvd
T-1309	Los Angeles	Van Nuys	Target Store	14920 Raymer St
T-1028	Los Angeles	West Covina	Target Store	2831 E Eastland Ctr Dr
T-2147	Los Angeles	West Covina	Target Store	2370 S. Azusa Ave.
T-0228	Los Angeles	West Hills	Target Store	6635 Fallbrook Ave
T-1884	Los Angeles	West Hollywood	Target Store	7100 Santa Monica Blvd Ste 201
T-2019	Los Angeles	Whittier	Target Store	15614 Whittwood Ln
T-0288	Los Angeles	Woodland Hills	Target Store	20801 Ventura Blvd
T-0692	Marin	Novato	Target Store	200 Vintage Way
T-0641	Merced	Merced	Target Store	3280 R St
T-2306	Monterey	Marina	Target Store	133 General Stilwell Dr.
T-0676	Monterey	Salinas	Target Store	1640 N Main St
T-1062	Monterey	Sand City	Target Store	2040 California Ave
T-1026	Napa	Napa	Target Store	205 Soscol Ave
T-1438	Napa	Napa	Target Store	4000 Bel Aire Plaza
T-0259	Orange	Aliso Viejo	Target Store	26932 La Paz Rd
T-0191	Orange	Anaheim	Target Store	1881 W Lincoln Ave
T-0677	Orange	Anaheim	Target Store	8108 E. Santa Ana Canyon Road
T-2082	Orange	Buena Park	Target Store	7530 Orangethorpe Ave
T-1293	Orange	Costa Mesa	Target Store	3030 Harbor Blvd Suite A
T-0229	Orange	Cypress	Target Store	6835 Katella Ave
T-0913	Orange	Foothill Ranch	Target Store	26762 Portola Pkwy
T-0293	Orange	Fullerton	Target Store	2920 Yorba Linda Blvd

EXHIBIT A TO THE COMPLAINT - COVERED FACILITIES

STORE/DC Number	COUNTY	CITY	CATEGORY	STREET ADDRESS
T-1383	Orange	Fullerton	Target Store	1893 W Malvern Ave
T-1418	Orange	Fullerton	Target Store	200 W Orangethorpe Ave
T-0192	Orange	Garden Grove	Target Store	12100 Harbor Blvd
T-0193	Orange	Garden Grove	Target Store	13831 Brookhurst St
T-2051	Orange	Huntington Beach	Target Store	9882 Adams Ave
T-0336	Orange	Irvine	Target Store	3750 Barranca Pkwy
T-1238	Orange	Irvine	Target Store	13200 Jamboree Rd
T-2128	Orange	Irvine	Target Store	115 Fortune Dr
T-0248	Orange	La Habra	Target Store	1000 E Imperial Hwy
T-0300	Orange	Mission Viejo	Target Store	24500 Alicia Pkwy
T-2163	Orange	Mission Viejo	Target Store	25601 Jeronimo Rd
T-0230	Orange	Orange	Target Store	2191 N Tustin St
T-0914	Orange	Rancho Santa Margarita	Target Store	30602 Santa Margarita Parkway
T-0250	Orange	Santa Ana	Target Store	3300 S Bristol St
T-0286	Orange	Santa Ana	Target Store	1330 E 17th St
T-1936	Orange	Santa Ana	Target Store	1441 W 17th St
T-1328	Orange	Seal Beach	Target Store	12300 Seal Beach Blvd
T-2151	Orange	Tustin	Target Store	2300 Park Ave
T-0249	Orange	Westminster	Target Store	16400 Beach Blvd
T-2304	Orange	Westminster	Target Store	200 Westminster Mall
T-1097	Placer	Auburn	Target Store	2700 Bell Rd
T-2214	Placer	Lincoln	Target Store	950 Groveland Ln
T-0267	Placer	Roseville	Target Store	1925 Douglas Blvd
T-1502	Placer	Roseville	Target Store	10451 Fairway Dr
T-0307	Riverside	Cathedral City	Target Store	67750 E Palm Canyon Dr
T-1548	Riverside	Corona	Target Store	2615 Tuscanny St
T-0761	Riverside	Hemet	Target Store	3527 W Florida Ave
T-1867	Riverside	La Quinta	Target Store	78935 US Hwy 111
T-2195	Riverside	Lake Elsinore	Target Store	18287 Collier Ave
T-0678	Riverside	Menifee	Target Store	30251 Antelope Rd
T-2471	Riverside	Menifee	Target Store	30340 Haun Rd
T-1961	Riverside	Mira Loma	Target Store	12471 Limonite Ave
T-2309	Riverside	Moreno Valley	Target Store	27100 Eucalyptus Ave
T-1283	Riverside	Murrieta	Target Store	41040 California Oaks Rd
T-0736	Riverside	Norco	Target Store	1290 Hamner Ave
T-0940	Riverside	Palm Desert	Target Store	72549 Highway 111
T-0212	Riverside	Riverside	Target Store	3520 Tyler St
T-0291	Riverside	Riverside	Target Store	3333 Arlington Ave
T-1843	Riverside	Riverside	Target Store	2755 Canyon Springs Pkwy
T-0359	Riverside	Temecula	Target Store	29676 Rancho California Rd
T-1121	Sacramento	Citrus Heights	Target Store	5837 Sunrise Blvd
T-1025	Sacramento	Elk Grove	Target Store	7505 Laguna Blvd
T-1098	Sacramento	Folsom	Target Store	430 Blue Ravine Rd
T-0268	Sacramento	Rancho Cordova	Target Store	10881 Olson Dr
T-0310	Sacramento	Sacramento	Target Store	2505 Riverside Blvd
T-0311	Sacramento	Sacramento	Target Store	5001 Madison Ave
T-0312	Sacramento	Sacramento	Target Store	1919 Fulton Ave
T-1527	Sacramento	Sacramento	Target Store	8101 Cosumnes River Blvd
T-2115	Sacramento	Sacramento	Target Store	3601 North Freeway Blvd
T-0941	San Benito	Hollister	Target Store	1790 Airline Hwy
T-0939	San Bernardino	Apple Valley	Target Store	19201 Bear Valley Rd

EXHIBIT A TO THE COMPLAINT - COVERED FACILITIES

STORE/DC Number	COUNTY	CITY	CATEGORY	STREET ADDRESS
T-2260	San Bernardino	Apple Valley	Target Store	20288 US Highway 18
T-0258	San Bernardino	Chino	Target Store	5555 Philadelphia St
T-0912	San Bernardino	Chino	Target Store	3944 Grand Ave
T-0660	San Bernardino	Fontana	Target Store	16964 Slover Ave
T-1958	San Bernardino	Fontana	Target Store	15272 Summit Ave
T-0553	San Bernardino	Fontana	Distribution Center	14750 Miller Ave
T-2468	San Bernardino	Hesperia	Target Store	12795 Main St
T-1423	San Bernardino	Montclair	Target Store	9052 Central Ave
T-0186	San Bernardino	Ontario	Target Store	1333 N. Mountain Ave
T-2245	San Bernardino	Ontario	Target Store	4200 E 4th Street
T-0595	San Bernardino	Ontario	Distribution Center	1505 S. Haven Ave
T-0301	San Bernardino	Rancho Cucamonga	Target Store	10576 Foothill Blvd
T-1869	San Bernardino	Redlands	Target Store	27320 W Lugonia Ave
T-3806	San Bernardino	Rialto	Distribution Center	3105 N. Mango Ave
T-3807	San Bernardino	Rialto	Distribution Center	3110 N Alder Ave
T-0188	San Bernardino	San Bernardino	Target Store	499 W Orange Show Rd
T-0297	San Bernardino	San Bernardino	Target Store	2380 Sterling Ave
T-1834	San Bernardino	Upland	Target Store	1931 Campus Ave
T-0276	San Bernardino	Victorville	Target Store	15321 Palmdale Rd
T-0203	San Diego	Chula Vista	Target Store	1240 Broadway
T-0204	San Diego	Chula Vista	Target Store	40 N 4th Ave
T-1815	San Diego	Chula Vista	Target Store	910 Eastlake Pkwy
T-0304	San Diego	El Cajon	Target Store	250 Broadway
T-1140	San Diego	El Cajon	Target Store	2911 Jamacha Rd
T-1029	San Diego	Encinitas	Target Store	1010 N El Camino Real
T-0274	San Diego	Escondido	Target Store	1280 Auto Park Way
T-0997	San Diego	La Mesa	Target Store	5500 Grossmont Ctr Dr
T-2232	San Diego	National City	Target Store	3060 Plaza Bonita Rd.
T-0303	San Diego	Oceanside	Target Store	2255 S El Camino Real
T-0296	San Diego	Poway	Target Store	14823 Pomerado Rd
T-0201	San Diego	San Diego	Target Store	3245 Sports Arena Blvd
T-0202	San Diego	San Diego	Target Store	5454 Balboa Ave
T-0205	San Diego	San Diego	Target Store	8001 Othello Ave
T-0305	San Diego	San Diego	Target Store	8251 Mira Mesa Blvd
T-1410	San Diego	San Diego	Target Store	1288 Camino Del Rio N
T-1846	San Diego	San Diego	Target Store	3424 College Ave
T-1485	San Diego	Santee	Target Store	9846 Mission Gorge Rd
T-1040	San Diego	Vista	Target Store	1751 University Dr
T-2347	San Joaquin	Lathrop	Target Store	16858 Golden Valley Pkwy
T-0853	San Joaquin	Lodi	Target Store	2375 W Kettleman Ln
T-1526	San Joaquin	Manteca	Target Store	280 Spreckels Ave
T-0313	San Joaquin	Stockton	Target Store	4707 Pacific Ave
T-1862	San Joaquin	Stockton	Target Store	10424 Trinity Parkway
T-0738	San Joaquin	Tracy	Target Store	2800 Naglee Rd
T-1120	San Luis Obispo	Paso Robles	Target Store	2305 Theatre Dr
T-0320	San Mateo	Colma	Target Store	5001 Junipero Serra Blvd
T-1407	San Mateo	Daly City	Target Store	133 Serramonte Ctr
T-0321	San Mateo	Redwood City	Target Store	2485 El Camino Real
T-1054	San Mateo	San Bruno	Target Store	1150 El Camino Real
T-1122	San Mateo	San Mateo	Target Store	2220 Bridgepointe Pkwy
T-0309	Santa Barbara	Santa Maria	Target Store	223 E Betteravia Rd
T-0323	Santa Clara	Cupertino	Target Store	20745 Stevens Creek Blvd

EXHIBIT A TO THE COMPLAINT - COVERED FACILITIES

STORE/DC Number	COUNTY	CITY	CATEGORY	STREET ADDRESS
T-1851	Santa Clara	Gilroy	Target Store	6705 Camino Arroyo
T-0640	Santa Clara	Morgan Hill	Target Store	170 Cochrane Plz
T-2252	Santa Clara	Morgan Hill	Target Store	1061 Cochrane Rd.
T-0322	Santa Clara	Mountain View	Target Store	555 Showers Dr
T-0324	Santa Clara	San Jose	Target Store	1811 Hillsdale Ave
T-0325	Santa Clara	San Jose	Target Store	3155 Silver Creek Rd
T-0626	Santa Clara	San Jose	Target Store	2155 Morrill Ave
T-1426	Santa Clara	San Jose	Target Store	450 N Capital Ave
T-1427	Santa Clara	San Jose	Target Store	1600 Saratoga Ave
T-1927	Santa Clara	San Jose	Target Store	879 Blossom Hill Rd
T-1984	Santa Clara	San Jose	Target Store	1750 Story Rd
T-2088	Santa Clara	San Jose	Target Store	533 Coleman Ave
T-2238	Santa Clara	San Jose	Target Store	3155 Silver Creek Rd
T-2281	Santa Clara	San Jose	Target Store	2161 Monterey Hwy
T-1412	Santa Clara	Sunnyvale	Target Store	211 W Iowa Ave
T-1143	Santa Cruz	Watsonville	Target Store	1415 Main St
T-0615	Shasta	Redding	Target Store	1280 Dana Dr
T-0675	Solano	Fairfield	Target Store	2059 Cadenasso Dr
T-0827	Solano	Vacaville	Target Store	3000 Harbison Dr
T-0331	Solano	Vallejo	Target Store	904 Admiral Callaghan Lane
T-0852	Sonoma	Rohnert Park	Target Store	475 Rohnert Park Expy W
T-0937	Sonoma	Santa Rosa	Target Store	1980 Santa Rosa Ave
T-0273	Stanislaus	Modesto	Target Store	3405 Mchenry Ave
T-0938	Stanislaus	Modesto	Target Store	3900 Sisk Rd
T-2096	Stanislaus	Riverbank	Target Store	2425 Claribel Rd
T-1304	Stanislaus	Turlock	Target Store	3000 Countryside Dr
T-0318	Sutter	Yuba City	Target Store	1153 Butte House Rd
T-0698	Tulare	Porterville	Target Store	1363 W Henderson Ave
T-2349	Tulare	Tulare	Target Store	2195 East Prosperity Ave
T-1805	Tulare	Visalia	Target Store	4247 S Mooney Blvd
T-1027	Ventura	Camarillo	Target Store	209 W Ventura Blvd
T-1547	Ventura	Moorpark	Target Store	800 New Los Angeles Ave
T-0181	Ventura	Oxnard	Target Store	250 W Esplanade Dr
T-0246	Ventura	Simi Valley	Target Store	2907 Cochran St
T-1100	Ventura	Thousand Oaks	Target Store	2705 Teller Rd
T-0298	Ventura	Ventura	Target Store	4200 E Main St
T-2268	Yolo	West Sacramento	Target Store	2005 Town Center Plz
T-0277	Yolo	Woodland	Target Store	1280 E Gibson Rd
T-2408	Yolo	Woodland	Target Store	12185 Bronze Star Dr.
T-0555	Yolo	Woodland	Distribution Center	2050 East Beamer St