

1 BOB LEE; #123686  
District Attorney  
2 MORGAN C. TAYLOR; #89474  
Asst. District Attorney  
3 701 Ocean St., Room 200  
Santa Cruz, CA 95060  
4 Tel: (831) 454-2553  
Fax: (831) 454-2227

5 Attorneys for Plaintiff PEOPLE  
6 OF THE STATE OF CALIFORNIA

**FILED**  
NOV 22 2005

ALEX CALVO, CLERK  
BY DAJAH RUIZ  
DEPUTY, SANTA CRUZ COUNTY

7  
8 SUPERIOR COURT OF CALIFORNIA

9 IN AND FOR THE COUNTY OF SANTA CRUZ

10 PEOPLE OF THE STATE OF CALIFORNIA, ) No. **CV 153032**  
11 Plaintiffs ) COMPLAINT FOR CIVIL  
12 vs. ) PENALTIES AND EQUITABLE  
13 TROWBRIDGE ENTERPRISES, INC., ) RELIEF  
14 PALACE ART AND OFFICE SUPPLY, and )  
DOES 1 through 20, inclusive, )  
15 )  
16 Defendants. )

17 Come now the PEOPLE OF THE STATE OF CALIFORNIA, and for  
18 cause of action against defendants and each of them, alleges as  
19 follows, upon information and belief:

20 FIRST CAUSE OF ACTION

21 [Health & Safety Code §25249.6]

22 1. At all times relevant to this complaint, TROWBRIDGE  
23 ENTERPRISES, INC. was a California corporation doing business in  
24 Santa Cruz County, California as a retailer of art and office  
25 supplies, under the fictitious business name of PALACE ART AND  
26 OFFICE SUPPLY, and employing ten or more persons.

27 2. Plaintiff is ignorant of the identities of Defendants  
28 sued herein as DOES 1 through 20, inclusive.



1 \$2,500 for each separate violation of Health & Safety Code  
2 \$25249.6, pursuant to Health & Safety Code §25249.7.

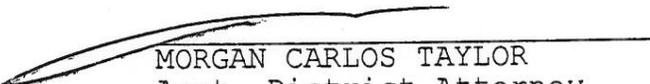
3 2. That the Defendants pay a civil penalty not to exceed  
4 \$2,500 for each separate violation of Business & Professions Code  
5 §17200, pursuant to Business & Professions Code Section 17206.

6 3. That the Court grant a preliminary and a permanent  
7 injunction pursuant to Health and Safety Code §25249.7 and  
8 Business & Professions Code §17203, prohibiting Defendants and  
9 each of them from exposing persons within the State of California  
10 to lead without providing clear and reasonable warnings as  
11 required by law.

12 4. That the Court grant such other and further relief as in  
13 the premises it may deem just and proper.

14 DATED: November 21, 2005

BOB LEE  
District Attorney

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17 MORGAN CARLOS TAYLOR  
Asst. District Attorney

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