

**SUMMONS  
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

CHANDLER'S ROOFING, INC., NAVARRO ROOFING, VISTA ROOFING COMPANY, INC., C W ROOFING, (Additional Parties Attachment form is attached.)

**YOU ARE BEING SUED BY PLAINTIFF:**

**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

CONSUMER ADVOCACY GROUP, INC., in the interest of the Public,

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

CONFIDENTIAL COPY  
OF ORIGINAL FILED  
Los Angeles Superior Court

REC 6 A 2007

John A. Clarke, Executive Officer/Clerk

\_\_\_\_\_, Deputy

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association.

*Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.courtinfo.ca.gov/selfhelp/espanol/](http://www.courtinfo.ca.gov/selfhelp/espanol/)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.*

*Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.courtinfo.ca.gov/selfhelp/espanol/](http://www.courtinfo.ca.gov/selfhelp/espanol/)) o poniéndose en contacto con la corte o el colegio de abogados locales.*

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of the State of California for the County of Los Angeles  
Stanley Mosk Courthouse  
111 North Hill Street, Los Angeles, California 90012

CASE NUMBER:  
(Número del Caso):

80365839

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

REUBEN YEROUHALMI, YEROUSHALMI & ASSOCIATES, 3700 WILSHIRE BLVD., SUITE 480, LOS ANGELES, CA 90010, 213-382-3183

DATE:

(Fecha)

JOHN A. CLARKE

Clerk, by

(Secretario)

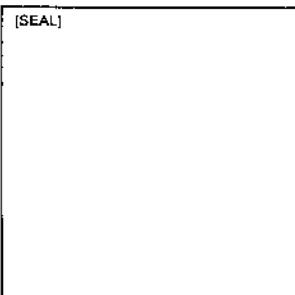
RUCENA

Deputy

(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



**NOTICE TO THE PERSON SERVED: You are served**

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify):
 

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
- by personal delivery on (date):

**COPY**

SHORT TITLE: Consumer Advocacy Group, Inc. v. Chandler's Roofing, Inc., et al.	CASE NUMBER:
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**INSTRUCTIONS FOR USE**

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

Plaintiff
  Defendant
  Cross-Complainant
  Cross-Defendant

SUNCOAST ROOFING COMPANY, GIL'S ROOFING, INC., A. PREMAN ROOFING, INC., WON, INC., AMERI TECH CONSTRUCTION, INC., and DOES 1-500

1 REUBEN YEROUSHALMI (SBN 193981)  
2 DANIEL D. CHO (SBN 105409)  
3 YEROUSHALMI & ASSOCIATES  
4 3700 WILSHIRE BLVD., SUITE 480  
5 LOS ANGELES, CA 90010  
6 213-382-3183

7 Attorneys for Plaintiff,  
8 Consumer Advocacy Group, Inc.

CONFIRMED COPY  
OF ORIGINAL FILED  
Los Angeles Superior Court  
JAN 27 1987  
John A. Clarke, Executive Officer/Clerk

\_\_\_\_\_ Deput

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF LOS ANGELES

10165839

11 CONSUMER ADVOCACY GROUP, )  
12 INC., in the interest of the Public, )  
13 Plaintiff, )  
14 v. )  
15 CHANDLER'S ROOFING, INC., )  
16 NAVARRO ROOFING, VISTA ROOFING )  
17 COMPANY, INC., C W ROOFING, )  
18 SUNCOAST ROOFING COMPANY, )  
19 GIL'S ROOFING, INC., A. PREMAN )  
20 ROOFING, INC., WON, INC., AMERI )  
21 TECH CONSTRUCTION, INC., and )  
22 DOES 1-500, )  
23 Defendants. )

Case No.

COMPLAINT

1. Violation of Proposition 65, the Safe  
Drinking Water and Toxic Enforcement  
Act of 1986 (Health & Safety Code §§  
25249.5, et seq.)

**COPY**

Action is an Unlimited Civil Case  
(Amount demand exceeds \$25,000)

23 **BACKGROUND AND PRELIMINARY FACTS**

24 1. In 1986, California voters approved an initiative to address growing concerns about  
25 exposure to toxic chemicals. The initiative, The Safe Drinking Water and Toxic  
26 Enforcement Act of 1986, codified at Health and Safety Code sections 25249.5 et seq.  
27 ("Proposition 65"), helps to protect California's drinking water sources from  
28

1           contamination, to allow consumers to make informed choices about the products they  
2           buy, and to enable persons to protect themselves from toxic chemicals as they see fit.

- 3  
4           2. Proposition 65 requires the Governor of California to publish a list of chemicals known to  
5           the state to cause cancer, birth defects, or other reproductive harm (“Proposition 65-  
6           Listed Chemicals”). (Health & Saf. Code, § 25249.8.) The list, which the Governor  
7           updates at least once a year, contains over 550 chemicals. Proposition 65 imposes  
8           warning requirements and other controls that apply to Proposition 65-Listed Chemicals.  
9  
10          3. All businesses with ten or more employees that operate or sell products in California  
11          must comply with Proposition 65. Under Proposition 65, businesses are: (1) prohibited  
12          from knowingly discharging Proposition 65-Listed Chemicals into sources of drinking  
13          water (Health & Saf. Code, § 25249.5), and (2) required to provide “clear and  
14          reasonable” warnings before exposing a person, knowingly and intentionally, to a  
15          Proposition 65-Listed Chemical (Health & Saf. Code, § 25249.6). A business can satisfy  
16          its obligations under Health and Safety Code section 25249.6 by the tendering the  
17          requisite warnings through various means, e.g. labeling a consumer product, posting  
18          signs, or publishing notices in a newspaper.  
19  
20          4. Plaintiff, Consumer Advocacy Group, Inc. (“Plaintiff”), is a non-profit corporation  
21          qualified to do business in the State of California. It brings this action in the public  
22          interest as defined under Health and Safety Code section 25249.7, subdivision (d).  
23  
24          5. In 2000 and 2001, Plaintiff conducted research, from which it identified an industry-wide  
25          practice among California companies, which install, repair, or replace roofs, of exposing,  
26          knowingly and intentionally, persons to asphalt without first providing clear and  
27  
28

1 reasonable warnings of such to exposed persons prior to exposure. Asphalt is extremely  
2 toxic, containing numerous Proposition 65-Listed Chemicals.

3  
4 6. Defendants Chandler's Roofing, Inc., Navarro Roofing, Vista Roofing Company, Inc., C  
5 W Roofing, Suncoast Roofing Company, Gil's Roofing, Inc., A. Preman Roofing, Inc.,  
6 Won, Inc., Ameri Tech Construction, Inc., and DOES 1-500, are and at all times  
7 mentioned herein have been qualified to do business in the State of California. At all  
8 times mentioned herein, such defendants have conducted business within the State of  
9 California.

10  
11 7. Plaintiff is ignorant of the true names and capacities of defendants sued as Does 1-500.  
12 Plaintiff therefore sues these defendants by such fictitious names. Plaintiff will amend  
13 this complaint to allege their true names and capacities when ascertained. Plaintiff is  
14 informed, believes, and thereon alleges that each fictitiously named defendant is  
15 responsible in some manner for the occurrences and damages alleged herein.

16  
17 8. At all times mentioned herein, "Defendants" include Chandler's Roofing, Inc., Navarro  
18 Roofing, Vista Roofing Company, Inc., C W Roofing, Suncoast Roofing Company, Gil's  
19 Roofing, Inc., A. Preman Roofing, Inc., Won, Inc., Ameri Tech Construction, Inc., and  
20 Does 1 through 500.

21  
22 9. The Court has jurisdiction over this lawsuit pursuant to California Constitution Article  
23 VI, Section 10, which grants the Superior Court original jurisdiction in all causes except  
24 those given by statute to other trial courts. Plaintiff brings this lawsuit under statutes that  
25 do not specify any other basis of jurisdiction.  
26  
27  
28

FIRST CAUSE OF ACTION

1  
2 By Plaintiff, CONSUMER ADVOCACY GROUP, INC., and against Defendants,  
3 CHANDLER'S ROOFING, INC., NAVARRO ROOFING, VISTA ROOFING  
4 COMPANY, INC., C W ROOFING, SUNCOAST ROOFING COMPANY, GIL'S  
5 ROOFING, INC., A. PREMAN ROOFING, INC., WON, INC., AMERI TECH  
6 CONSTRUCTION, INC., and DOES 1-500, for violation of Proposition 65, The Safe  
7 Drinking Water and Toxic Enforcement Act of 1986 (Health and Safety Code sections  
8 25249.5, et seq.)  
9  
10

11 10. Plaintiff repeats and incorporates by reference the preceding paragraphs of this complaint  
12 as though fully set forth herein.

13 11. Defendants are and at all times mentioned herein have been engaged in the business of  
14 installing, repairing, and or replacing the roofs on residential and commercial structures.  
15

16 12. Defendants have been exposing persons, knowingly and intentionally, by deliberately  
17 using asphalt, to the constituent Proposition 65-Listed Chemicals of asphalt, without first  
18 giving clear and reasonable warning of such to exposed persons before the time of  
19 exposure. (Health & Saf. Code, § 25249.6.)  
20

21 13. Plaintiff mailed a separate Proposition 65 60-day Notice of intent to sue to Chandler's  
22 Roofing, Inc., Navarro Roofing, Vista Roofing Company, Inc., C W Roofing, Suncoast  
23 Roofing Company, Gil's Roofing, Inc., A. Preman Roofing, Inc., Won, Inc., and Ameri  
24 Tech Construction, Inc., respectively. Such Notices stated that each respective defendant,  
25 by failing to warn persons of exposures to Proposition 65-Listed Chemicals before  
26 exposing them to such chemicals, violated Proposition 65. Plaintiff mailed copies of  
27 each notice to the Office of the Attorney General, State of California, Department of  
28

1 Justice ("Attorney General"), and the County District Attorneys for each county and City  
2 Attorneys for each city containing a population of at least 750,000 people, within which  
3 each respective named defendant violated Proposition 65.  
4

5 14. On or about February 8, 2006, Plaintiff sent a Proposition 65 60-Day Notice of intent to  
6 sue to Chandler's Roofing, Inc. alleging the facts found in Paragraph 12 of this pleading.

7 15. On or about February 8, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65 60-  
8 Day Notice of intent to sue to Navarro Roofing alleging the facts in Paragraph 12 of this  
9 pleading.  
10

11 16. On or about February 22, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65  
12 60-Day Notice of intent to sue to Vista Roofing Company, Inc. alleging the facts found in  
13 Paragraph 12 of this pleading.

14 17. On or about February 8, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65 60-  
15 Day Notice of intent to sue to C W Roofing alleging the facts found in Paragraph 12 of  
16 this pleading.  
17

18 18. On or about February 8, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65 60-  
19 Day Notice of intent to sue to Suncoast Roofing Company alleging the facts found in  
20 Paragraph 12 of this pleading.  
21

22 19. On or about February 8, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65 60-  
23 Day Notice of intent to sue to Gil's Roofing, Inc. alleging the facts found in Paragraph 12  
24 of this pleading.

25 20. On or about February 22, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65  
26 60-Day Notice of intent to sue to A. Preman Roofing, Inc. alleging the facts found in  
27 Paragraph 12 of this pleading.  
28

- 1 21. On or about February 8, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65 60-  
2 Day Notice of intent to sue to Won, Inc. alleging the facts found in Paragraph 12 of this  
3 pleading.  
4
- 5 22. On or about February 8, 2006, Consumer Advocacy Group, Inc. sent a Proposition 65 60-  
6 Day Notice of intent to sue to Ameri Tech Construction, Inc. alleging the facts found in  
7 Paragraph 12 of this pleading.  
8
- 9 23. Each Proposition 65 60-Day Notice of intent to sue listed above included a certificate of  
10 merit executed by the attorney for the noticing party. The certificate of merit stated that  
11 the attorney for the noticing party who executed the certificate had consulted with at least  
12 one person with relevant and appropriate expertise who had reviewed data regarding the  
13 exposure to the Proposition 65-Listed Chemicals subject to the action. Based on that  
14 information, the attorney for the noticing party who executed the certificate believed  
15 there was a reasonable and meritorious case for this private action. The attorney for the  
16 noticing party attached to the certificate of merit served on the Attorney General  
17 information sufficient to establish the basis of the certificate of merit.  
18
- 19 24. Plaintiff is commencing this action more than sixty days (plus additional time for mailing  
20 of notice pursuant to the Code of Civil Procedure) from the date Plaintiff gave notice of  
21 the alleged violations of Proposition 65 to each named defendant, the Attorney General,  
22 and applicable district attorneys and city attorneys in whose jurisdictions the violations  
23 allegedly occurred.  
24
- 25 25. Plaintiff is informed, believes, and thereon alleges that neither the Attorney General, nor  
26 any applicable district attorney or city attorney has commenced and is diligently  
27 prosecuting an action against the violation.  
28

1 26. Between three years before the sending of each respective Proposition 65 60-Day Notice  
2 of intent to sue and the present, in the normal course of business, Defendants installed,  
3 repaired, and or replaced roofs. Defendants have been exposing, knowingly and  
4 intentionally, reasonably foreseeable members of the public, including occupants of the  
5 structures serviced, neighbors of the same, passersby, motorists, and inspectors not  
6 employed by Defendants, to Proposition 65-Listed Chemicals by using asphalt, including  
7 hot asphalt, "cold" asphalt emulsions and adhesives, asphalt shingles, and inter-ply layers  
8 of asphalt or coal tar. Defendants exposed such persons without providing "clear and  
9 reasonable" warnings to affected persons before exposing such persons, knowingly and  
10 intentionally, to Proposition 65-Listed Chemicals. In doing so, Defendants violated  
11 Proposition 65.  
12

13  
14  
15 27. As to environmental exposures, Defendants failed to provide a warning either that (A)  
16 appears on a sign in the affected area, (B) constitutes a posting of signs in the manner  
17 described in Cal. Code Regs., tit. 3, § 6776(d), (C) is in a notice mailed or otherwise  
18 delivered to each occupant in the affected area at least once in any three-month period,  
19 and/or (D) provided by public media announcements that targets the affected area at least  
20 once in any three-month period.  
21

22 28. As to Occupational Exposures, Defendants failed to provide an adequate warning.

23 29. Between three years before the sending of each respective Proposition 65 60-Day Notice  
24 of intent to sue and the present, in the normal course of business, Defendants installed,  
25 repaired, and or replaced roofs. Defendants have also been exposing, knowingly and  
26 intentionally, their employees, including roofing contractors, drivers, roofing installers,  
27 and workers otherwise involved in the installation, repair, and or replacement of roofs, to  
28

1 Proposition 65-Listed Chemicals by using asphalt, including hot asphalt, "cold" asphalt  
2 emulsions and adhesives, asphalt shingles, and inter-ply layers of asphalt or coal tar.  
3  
4 Defendants exposed such employees without providing "clear and reasonable" warnings  
5 to affected employees before exposing such persons, knowingly and intentionally, to  
6 Proposition 65-Listed Chemicals. In doing so, Defendants violated Proposition 65.

7 30. The sources of exposures are the constituent chemicals of asphalt, as listed in this  
8 complaint. The locations of the exposures include:

- 9
- 10 a. Violators' principal places of business and areas within 50 feet of the same;
  - 11 b. Areas along and within 50 feet of the routes traveled between said principal  
12 places of business and where Defendants stored roofing materials, such as storage  
13 facilities and garage areas, wherein Defendants also prepared and heated the  
14 asphalt;
  - 15 c. Areas along and within 50 feet of the routes traveled between said principal  
16 places of business and where Defendants performed roofing work, including  
17 roofing installations, removals, and replacements; and
  - 18 d. Areas within 50 feet of where Defendants performed roofing work or established  
19 staging grounds for the performance of such work.  
20  
21

22 32. These Environmental and Occupational Exposures occurred in the California counties  
23 whose district attorneys received copies of the operative 60-Day Notices relevant to each  
24 respective named defendant.

25 33. The route of exposure for Environmental Exposures is inhalation contact whereby  
26 affected persons breathed in the ambient air, which contained asphalt, asphalt smoke, or  
27 associated fumes, causing contact with their mouths, throats, esophagi, and lungs.  
28

1 Defendants possessed sufficient control over the relevant areas to control the quality of  
2 the ambient air.

3  
4 34. The route of exposure for Occupational Exposures is inhalation contact whereby affected  
5 employees breathed in the ambient air, which contained asphalt, asphalt smoke, or  
6 associated fumes, causing contact with their mouths, throats, esophagi, and lungs.

7 Defendants possessed sufficient control over the relevant areas to control the quality of  
8 the ambient air. Employees also sustained inhalation contact by inhaling particulate  
9 matter and other airborne constituents, including gaseous emissions released from "cold"  
10 asphalt emulsions and adhesives, asphalt shingles, and inter-ply layers of asphalt or coal  
11 tar, when they removed various roofing products from packaging and or tore out  
12 previously installed roofing products in preparation of re-roofing. The route of exposure  
13 for Occupational Exposures is also Dermal Contact, whereby employees allowed their  
14 bare skin to touch, intentionally or inadvertently, asphalt products, while mixing, heating,  
15 transporting, or applying the same. Dermal Contact also occurred when Employees, after  
16 allowing work gloves to touch asphalt, then touched their bare skin with the asphalt-  
17 impregnated work gloves. Said exposures occurred in the California counties whose  
18 district attorneys received copies of the operative notices.

19  
20  
21  
22 35. For each type and means of exposure, Defendants have exposed and are exposing the  
23 above referenced persons to the Proposition 65-Listed Chemicals listed below.

24 **CARCINOGENS**

25 Benz[a]anthracene	Chrysene	Toluene diisocyanate	Formaldehyde (gas)
26 5-Methylchrysene	Nickel and Nickel Compounds	Dichloromethane (Methylene Chloride)	Benzene
27 Lead and Lead Compounds	Benzo[b]flouranthene	Benzo[k]flouranthene	Benzo[a]pyrene
28 Indeno[1,2,3-cd]pyrene	Acetaldehyde	Beryllium and	Arsenic

		Beryllium compounds	(inorganic arsenic compounds)
Cadmium and Cadmium compounds	Chromium (hexavalent compounds)	Tetrachloroethylene (Perchloroethylene)	Trichloroethylene
Formaldehyde (gas)	Chrysene	Dibenz[a,h]anthracene	Carbazole
Dibenzo[a,i]pyrene	Dibenzo[a,e]pyrene	Dibenz[a,j]acridine	Dibenzo[a,h]p
Dibenzo[a,l]pyrene			

**REPRODUCTIVE TOXINS**

Toluene	Carbon Disulfide	Benzene	Lead
Mercury and Mercury compounds	Arsenic (inorganic oxides)	Cadmium	

36. Each Proposition 65-Listed Chemical listed above first appeared on the Governor's Proposition 65 list more than twenty months before the sending of a Proposition 65 60-Day Notice of intent to sue to each respective named defendant. Therefore, each Proposition 65-Listed Chemical was subject to Proposition 65 warning requirements at the times of the exposures alleged herein.

37. For the past several years, both the Attorney General and Plaintiff have investigated and prosecuted asphalt roofing entities as an industry for alleged violations of Proposition 65. Plaintiff and its counsel expended and continue to expend significant resources, including time, money, and energy, in trying to bring all members of the Asphalt Roofing Industry in compliance with Proposition 65. The Attorney General and Plaintiff co-litigated a previous action that resulted in a universal settlement reached with over 100 asphalt roofing entities. That settlement had an extensive opt-in period that allowed all roofing entities, including these defendants, to join the settlement and end not only their continual violations of Proposition 65, but also their potential liabilities for alleged violations of the statute. Accordingly, these defendants have had plenty of time and opportunities to end their violations of Proposition 65 and come into compliance with the law.

1 38. Instead, these defendants flouted the various opportunities they had to comply with  
2 Proposition 65, and chose instead not to participate in a win-win settlement agreement  
3 offered by both the Attorney General and Plaintiff. The settlement these defendants  
4 chose not to participate in would have benefited all parties involved, in that it would have  
5 required defendants to significantly reduce both their employees' as well as the public's  
6 exposures to deadly chemicals, and would have obligated these defendants to post the  
7 required warnings. By choosing to continue their violations, these defendants have  
8 significantly enlarged their potential liabilities for violating Proposition 65.  
9  
10

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff in the FIRST CAUSE OF ACTION demands against each defendant as  
13 follows:

- 14 1. A permanent injunction pursuant to Health and Safety Code section 25249.7, subdivision (a)  
15 and the equitable powers of the court;  
16  
17 2. Penalties pursuant to Health and Safety Code section 25249.7, subdivision (b) of \$2,500.00  
18 per day per violation;  
19  
20 3. Costs of suit;  
21  
22 4. Reasonable attorney fees and costs; and  
23  
24 5. Any further relief that the court may deem just and equitable.

25 Dated: February 6, 2007

26   
27 \_\_\_\_\_  
28 Reuben Yeroushalmi  
Attorney for Plaintiff,  
Consumer Advocacy Group, Inc.