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SAN FRANCISCO COUNTY  
SUPERIOR COURT

2007 MAR 22 AM 7:57

GORDON PARK - LI. CLERK

Deborah Steppe

BY: ~~Deborah Steppe~~

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8 Attorneys for Plaintiff,  
9 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

CASE MANAGEMENT CONFERENCE SET

AUG 24 2007 -9<sup>00</sup> AM

DEPARTMENT 212

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN FRANCISCO  
12 (Unlimited Jurisdiction)

13 CGC-07-461598

14 MATEEL ENVIRONMENTAL  
JUSTICE FOUNDATION,

CASE NO.

15 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

16 v.

18 COST PLUS, INC.; FEDERATED  
DEPARTMENT STORES, INC.; MACY'S  
19 DEPARTMENT STORES, INC.

TOXIC TORT/ENVIRONMENTAL

20 Defendants.  
21 \_\_\_\_\_/

22 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

23 INTRODUCTION

24  
25 1. This Complaint seeks civil penalties and an injunction to remedy the continuing  
26 failure of defendants COST PLUS, INC.; FEDERATED DEPARTMENT STORES, INC.;  
27 MACY'S DEPARTMENT STORES, INC., (hereinafter "Defendants"), to give clear and  
COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

1 reasonable warnings to those residents of California, who handle and use brass napkin rings that  
2 contain lead (Leaded Brass Napkin Rings). The bodies of these Leaded Brass Napkin Rings are  
3 made from leaded brass, which contains lead and lead compounds (“lead”), which are chemicals  
4 known to cause cancer, birth defects and other reproductive harm. California residents are  
5 exposed to lead when they handle these Leaded Brass Napkin Rings.

6 2. Defendants are businesses that manufacture, market, and/or distribute Leaded  
7 Brass Napkin Rings. Defendants intend that residents of California handle and use Leaded Brass  
8 Napkin Rings that Defendants manufacture, market, and/or distribute. When these products are  
9 handled and used in their normally intended manner, they expose people to lead. In spite of  
10 knowing that residents of California were and are being exposed to these chemicals when they  
11 handle and use Leaded Brass Napkin Rings, Defendants did not and do not provide clear and  
12 reasonable warnings that these products cause exposure to chemicals known to cause cancer,  
13 birth defects and other reproductive harm.

14 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
15 to compel Defendants to bring their business practices into compliance with section 25249.5 et  
16 seq. by providing a clear and reasonable warning to each individual who has been and who in the  
17 future may be exposed to the above mentioned toxic chemicals from the use of Defendants’  
18 products. Plaintiff seeks an order that defendants identify and locate each individual person who  
19 in the past has purchased Leaded Brass Napkin Rings and to provide to each such purchaser a  
20 clear and reasonable warning that the Leaded Brass Napkin Rings will cause exposures to  
21 chemicals known to cause birth defects.

22 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure  
23 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known  
24 to cause cancer, birth defects and other reproductive harm.

#### 25 PARTIES

26 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION (“Mateel”)  
27 is a non-profit organization dedicated to, among other causes, the protection of the environment,

1 promotion of human health, environmental education, and consumer rights. Mateel is based in  
2 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a  
3 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement  
4 action in the public interest pursuant to Health & Safety Code § 25249.7(d). Residents of  
5 California are regularly exposed to lead and lead compounds from Leaded Brass Napkin Rings  
6 manufactured, distributed or marketed by Defendants and are so exposed without a clear and  
7 reasonable Proposition 65 warning.

8           6. Defendants are each a person doing business within the meaning of Health &  
9 Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or  
10 market Leaded Brass Napkin Rings in California, including the City and County of San  
11 Francisco. Manufacture, distribution and/or marketing of these products in the City and County  
12 of San Francisco and/or to people who live in San Francisco, causes people to be exposed to lead  
13 and lead compounds while they are physically present in the City and County of San Francisco.

14           7. Plaintiff brings this enforcement action against Defendants pursuant to Health &  
15 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a  
16 60-day Notice letter, dated July 27, 2006, which Mateel sent to California's Attorney General.  
17 Substantially identical letters were sent to every District Attorney in the state, and to the City  
18 Attorneys of every California city with a population greater than 750,000. On July 27, 2006,  
19 Mateel sent to each Defendant a letter substantively identical to the Notice letter it sent on that  
20 date to the Attorney General. Attached to the 60-Day Notice Letters sent to each defendant was  
21 a summary of Proposition 65 that was prepared by California's Office of Environmental Health  
22 Hazard Assessment. In addition, each 60-Day Notice Letter plaintiff sent was accompanied by a  
23 Certificate of Service attesting to the service of the 60-Day Notice Letter on each entity which  
24 received it. Pursuant to California Health & Safety Code Section 25249.7(d), a Certificate of  
25 Merit attesting to the reasonable and meritorious basis for the action was also sent with each 60-  
26 Day Notice Letter. Factual information sufficient to establish the basis of the Certificate of Merit  
27 was enclosed with the 60-Day Notice letters Mateel sent to the Attorney General on the two  
dates.



1 individual to a chemical known to the State of California to cause cancer or birth defects must  
2 first provide a clear and reasonable warning to such individual prior to the exposure.

3 14. Since at least 3 years prior to the filing of this complaint Defendants have  
4 engaged in conduct that violates Health and Safety Code Section 25249.6 et seq. This conduct  
5 includes knowingly and intentionally exposing to the above mentioned toxic chemicals, those  
6 California residents who handle and use Leaded Brass Napkin Rings. The normally intended use  
7 of Leaded Brass Napkin Rings causes exposure to lead and lead compounds, which are  
8 chemicals known to the State of California to cause cancer, birth defects and other reproductive  
9 harm. Defendants have not provided clear and reasonable warnings, within the meaning of  
10 Health & Safety Code Sections 25249.6 and 25249.11.

11 16. At all times relevant to this action, Defendants knew that the Leaded Brass  
12 Napkin Rings they manufactured, distributed, or marketed were causing exposures to lead and  
13 lead compounds. Defendants intended that residents of California handle and use Leaded Brass  
14 Napkin Rings in such ways as would lead to significant exposures to these chemicals.

15 17. By the above described acts, Defendants have violated Cal. Health & Safety Code  
16 Section 25249.6 and are therefore subject to an injunction ordering them to stop violating  
17 Proposition 65, to provide warnings to all present and future customers, and to provide warnings  
18 to their past customers who purchased defendants' products without receiving a clear and  
19 reasonable warning.

## 20 SECOND CAUSE OF ACTION

(Claim for Civil Penalties)

21 18. Plaintiff realleges and incorporates by reference into this Second Cause of Action,  
22 as if specifically set forth herein, paragraphs 1 through 18, inclusive.

23 19. By the above described acts, Defendants are liable and should be liable pursuant  
24 to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each  
25 individual exposed without proper warning to lead and lead compounds from the handling or use  
26 of Defendants' Leaded Brass Napkin Rings.

PRAYER FOR RELIEF

Wherefore, plaintiff prays for judgment against DEFENDANTS, as follows:

1. Pursuant to the First Cause of Action, that all Defendants be enjoined, restrained, and ordered to comply with the provisions of Section 25249.6 of the California Health & Safety Code;

2. Pursuant to the Second Cause of Action, that Defendants be assessed a civil penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of Defendants' manufacturing, distributing or marketing of Leaded Brass Napkin Rings;

3. That Defendants be ordered to identify and locate each individual who purchased Leaded Brass Napkin Rings and provide a warning to each such person that the Leaded Brass Napkin Rings the person purchased will expose that person to chemicals known to cause birth defects.

4. That, pursuant to Civil Procedure Code § 1021.5, Defendants be ordered to pay to Plaintiff the attorneys fees and costs it incurred in bringing this enforcement action.

5. For such other relief as this court deems just and proper.

Dated: March 5, 2007

KLAMATH ENVIRONMENTAL LAW  
CENTER



William Verick  
Attorney for Plaintiff  
Mateel Environmental Justice Foundation



# Klamath

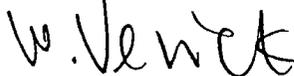
July 27, 2006

EDWARD G. WEIL  
DEPUTY ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY GENERAL  
P.O. BOX 70550  
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the private businesses on the attached service list have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when California residents come into contact with brass napkin rings. A list of specific examples of the specific types of products at issue is attached. The napkin rings are made from leaded brass, which contains lead and lead compounds ("lead"), which are chemicals known to cause cancer, birth defects and other reproductive harm. California residents are exposed to lead whenever they handle these napkin rings, such as when buying them, stocking shelves with them, while stuffing napkins into them, while setting tables, and while sitting at a table and removing napkins from the rings before eating. Lead is transferred from the brass napkin rings to their hands and to other parts of their skin. This lead is then absorbed through the skin, taken into cuts and abrasions, absorbed through mucous membranes, and transferred from the skin to the mouth via oral contact either directly with the lead-contaminated skin, and when lead is transferred from contaminated skin to cigarettes and food and the contaminated cigarettes and food are smoked and/or eaten. These lead exposures thus occur via the dermal absorption, subcutaneous, mucus membrane, ingestion and inhalation routes. The listed businesses did not and do not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since at least July 27, 2003, and will continue every day until the lead is removed from the brass napkin rings, or until clear and reasonable warnings are given. The above-referenced violations are alleged for occupational exposures as well as for consumer and environmental exposures. We do not, however, allege occupational exposure violations as to any brass napkin rings made outside of California, except as to workplaces these companies themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the bussinesses' property and in each of California's 58 counties.

Cordially,



William Verick

424 First Street, Eureka, CA 95501 • 707.268.8900 (phone) 707.268.8901 (fax)

## PRODUCT LIST

### **COST PLUS, INC.**

NAPKIN RING BRASS SCROLL, ITEM # 346040

This product description pertains not only to the specific model of the products listed, but also for all units of all models of brass napkin rings.

### **FEDERATED DEPARTMENT STORES, INC./ MACY'S DEPARTMENT STORES, INC.**

HOTEL ROUND BRASS NAPKIN RING SKU # 732994194532

This product description pertains not only to the specific model of the products listed, but also for all units of all models of brass napkin rings.

### **SUR LA TABLE, INC.**

CUBE NAPKIN RING ITEM # 0000475905

HEARTSHAPED NAPKIN RING ITEM # 0000475947

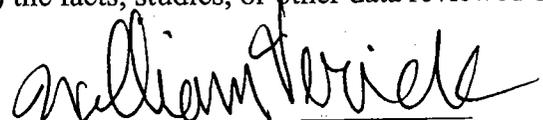
NAPKIN RING ITEM # 0000475921

These product descriptions pertain not only to the specific models of the products listed, but also for all units of all models of brass napkin rings.

**CERTIFICATE OF MERIT**

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: July 27, 2006

  
William Verick

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This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

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**CERTIFICATE OF SERVICE**

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On July 27, 2006 I caused the attached 60-DAY NOTICE LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on July 27, 2006, at Eureka, California.

  
Nicole Frank

## SERVICE LIST

EDWARD G. WEIL  
DEPUTY ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY  
GENERAL  
P.O. BOX 70550  
OAKLAND CA 94612-0550

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CITY OF OAKLAND  
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CITY OF SAN FRANCISCO  
CITY HALL ROOM 206  
400 VAN NESS  
SAN FRANCISCO, CA 94102

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CITY OF SACRAMENTO  
980 9<sup>th</sup> Street, 10<sup>th</sup> Floor  
SACRAMENTO, CA 95814

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN JOSE  
151 W. MISSION ST.  
SAN JOSE, CA 95110

OFFICE OF THE CITY ATTORNEY  
CITY OF LOS ANGELES  
200 N. MAIN ST.  
LOS ANGELES, CA 90012

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN DIEGO  
202 C ST. FLOOR 3  
SAN DIEGO, CA 92101

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OAKLAND, CA 94612

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ATTORNEY  
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OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF AMADOR  
108 COURT ST. SUITE 202  
JACKSON, CA 95642

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF BUTTE  
25 COUNTY CENTER DR.  
OROVILLE, CA 95965

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF CALAVERAS  
GOVERNMENT CENTER  
891 MOUNTAIN RANCH ROAD  
SAN ANDREAS, CA 95249

OFFICE OF THE DISTRICT  
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COLUSA, CA 95932

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF CONTRA COSTA  
P.O. BOX 670  
MARTINEZ, CA 94553

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ATTORNEY  
COUNTY OF DEL NORTE  
450 H ST #171  
CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF EL DORADO  
515 MAIN ST.  
PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF FRESNO  
2220 TULARE ST #1000  
FRESNO, CA 93721

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF GLENN  
P.O. BOX 430  
WILLOWS, CA 95988

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COUNTY OF HUMBOLDT  
825 5TH ST.  
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EL CENTRO, CA 92243

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INDEPENDENCE, CA 93526

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ATTORNEY  
COUNTY OF KERN  
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BAKERSFIELD, CA 93301

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF KINGS  
1400 W. LACEY BLVD.  
HANFORD, CA 93230

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ATTORNEY  
COUNTY OF LAKE  
255 N. FORBES ST # 424  
LAKEPORT, CA 95453

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ATTORNEY  
COUNTY OF LASSEN  
COUNTY ADMINISTRATION  
BUILDING  
707 NEVADA ST.  
SUSANVILLE, CA 96130

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF LOS ANGELES  
18000 CRIMINAL COURTS  
BUILDING  
210 W. TEMPLE ST.  
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COUNTY OF MADERA  
209 W. YOSEMITE AVE.  
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HALL OF JUSTICE #183  
SAN RAFAEL, CA 94903

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UKIAH, CA 95482

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2222 M ST.  
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ALTURAS, CA 9610

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ATTORNEY  
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BRIDGEPORT, CA 93517

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P.O. BOX 180  
SALINAS, CA 93902

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P.O. BOX 720  
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NEVADA CITY, CA 95959

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AUBURN, CA 95603-2687

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QUINCY, CA 95971

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COUNTY OF RIVERSIDE  
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222 E. WEBER AVE #202  
STOCKTON, CA 95202

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COUNTY OF SAN LUIS OBISPO  
COUNTY GOVERNMENT CENTER #450  
SAN LUIS OBISPO, CA 93408

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1112 SANTA BARBARA ST.  
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70 W. HEDDING ST.  
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701 OCEAN ST. #200  
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SANTA ROSA, CA 95403

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1100 I ST. #200  
MODESTO, CA 95354

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1160 CIVIC CENTER BLVD. #A  
YUBA CITY, CA 95993

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REDBLUFF, CA 96080

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COUNTY OF TRINITY  
P.O. BOX 310  
WEAVERVILLE, CA 96093

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TULARE  
COURTHOUSE #224  
VISALIA, CA 93291

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COUNTY OF TUOLUMNE  
2 S. GREEN ST.  
SONORA, CA 95370

VENTURA COUNTY DISTRICT  
ATTORNEY'S OFFICE  
c/o GREGORY BROSE D.D.A.  
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VENTURA, CA 93003

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204 4TH ST  
P.O. BOX 1247  
WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF YUBA  
215 5TH ST.  
MARYSVILLE, CA 95901

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TERRY J. LUNDGREN, CEO  
FEDERATED DEPT. STORES, INC.  
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ROBERT METTLER, CEO  
MACY'S DEPARTMENT STORES, INC.  
50 O'FARRELL STREET  
SAN FRANCISCO, CA 94106

KATHLEEN C. TIERNEY, CEO  
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