

ENDORSED
FILED
SAN FRANCISCO COUNTY
SUPERIOR COURT

2007 MAR 27 AM 11:00

GORDON PARK - LI, CLERK

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DEPUTY CLERK

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9 Attorneys for Plaintiff,
MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

CASE MANAGEMENT CONFERENCE SET

AUG 24 2007 - 9⁰⁰ AM

DEPARTMENT 212

SUMMONS ISSUED

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN FRANCISCO
12 (Unlimited Jurisdiction)

14 MATEEL ENVIRONMENTAL
15 JUSTICE FOUNDATION,

16 Plaintiff,

17 v.

18 STAUB S.A.; WILLIAMS SONOMA,
19 INC.; TARGET CORPORATION;

20 Defendants.

CASE NO. CGC-07-461732

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

TOXIC TORT/ENVIRONMENTAL

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 STAUB S.A.; WILLIAMS SONOMA, INC.; TARGET CORPORATION
27 (hereinafter "Defendants"), to give clear and reasonable warnings to those residents of

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

1 California, who handle and use cookware with brass handles that contain lead (Brass Handled
2 Cookware Products). The bodies of these Brass Handled Cookware Products are made from
3 leaded brass, which contains lead and lead compounds (“lead”), which are chemicals known to
4 cause cancer, birth defects and other reproductive harm. California residents are exposed to lead
5 when they handle these Brass Handled Cookware Products.

6 2. Defendants are businesses that manufacture, market, and/or distribute Brass
7 Handled Cookware Products. Defendants intend that residents of California handle and use Brass
8 Handled Cookware Products that Defendants manufacture, market, and/or distribute. When
9 these products are handled and used in their normally intended manner, they expose people to
10 lead. In spite of knowing that residents of California were and are being exposed to these
11 chemicals when they handle and use Brass Handled Cookware Products, Defendants did not and
12 do not provide clear and reasonable warnings that these products cause exposure to chemicals
13 known to cause cancer, 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 Brass Handled Cookware Products and to provide to each such
20 purchaser a clear and reasonable warning that the Brass Handled Cookware Products will cause
21 exposures to 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 Brass Handled Cookware
6 Products manufactured, distributed or marketed by Defendants and are so exposed without a
7 clear and 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 Brass Handled Cookware Products 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 Brass Handled Cookware Products. The normally
7 intended use of Brass Handled Cookware Products causes exposure to lead and lead compounds,
8 which are chemicals known to the State of California to cause cancer, birth defects and other
9 reproductive harm. Defendants have not provided clear and reasonable warnings, within the
10 meaning of Health & Safety Code Sections 25249.6 and 25249.11.

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

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

21 SECOND CAUSE OF ACTION

22 (Claim for Civil Penalties)

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

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

1 PRAYER FOR RELIEF

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

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

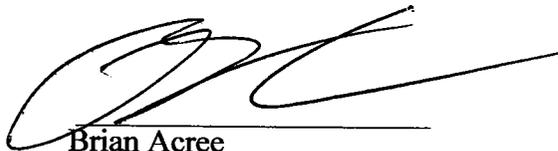
6 2. Pursuant to the Second Cause of Action, that Defendants be assessed a civil
7 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section
8 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of
9 Defendants' manufacturing, distributing or marketing of Brass Handled Cookware Products;

10 3. That Defendants be ordered to identify and locate each individual who purchased
11 Brass Handled Cookware Products and provide a warning to each such person that the Brass
12 Handled Cookware Products the person purchased will expose that person to chemicals known to
13 cause birth defects.

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

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

17
18 Dated: March 12, 2007



19
20 Brian Acree
21 Attorney for Plaintiff
22 Mateel Environmental Justice Foundation
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25
26
27



Klamath

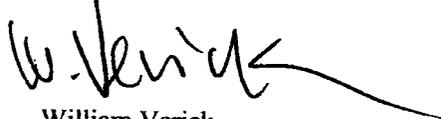
August 7, 2006

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 the brass handles on cookware these businesses market. A list of specific examples of the specific types of products at issue is attached. The handles on these frying pans, pots and pans (hereinafter "brass handled cookware") 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 brass handled cookware, such as when buying it, stocking shelves with it, while cooking with it, and while putting it away after washing it. Lead is transferred from the brass handles to peoples' 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 August 7, 2003, and will continue every day until the lead is removed from the brass handles, 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 handled cookware 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 private businesses' 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

MAUVIEL USA, INC./MAUVIEL

.75 QUART SAUCE PAN, ITEM # 17175

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

STAUB USA & STAUB en Alsace France/WILLIAMS SONOMA, INC.

STAUB CHICKEN ROASTER, BLACK; STAUB WOK; STAUB DEEP FRY PAN

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

RUFFONI/RUFFONI COPPER USA/RUFFONI USA/TARGET

COPPER OPERA FRYPAN

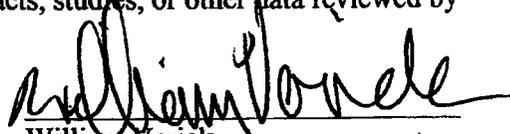
This product description pertains not only to the specific models of the products listed, but also for all units of all models of leaded brass cookware.

100-100-100

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: August 7, 2006

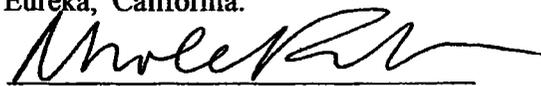

William Verick

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.

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. August 7, 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 August 7, 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	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF GLENN P.O. BOX 430 WILLOWS, CA 95988	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MONTEREY 240 CHURCH ST. P.O. BOX 180 SALINAS, CA 93902	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SISKIYOU P.O. BOX 986 YREKA, CA 96097	ROBERT J. ULRICH, CEO TARGET CORPORATION 100 NICOLLET MALL TPN-0945 MINNEAPOLIS, MN 55403
OFFICE OF THE CITY ATTORNEY CITY OF OAKLAND 505 14TH ST 12TH FLOOR OAKLAND, CA 94612	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF HUMBOLDT 825 5TH ST. EUREKA, CA 95501	COUNTY OF NAPA 931 PARKWAY MALL P.O. BOX 720 NAPA, CA 94559-0720	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SOLANO 600 UNION AVE FAIRFIELD, CA 94533	EDWARD A. MUELLER, CEO WILLIAMS SONOMA, INC. 3250 VAN NESS AVE SAN FRANCISCO, CA 94109
OFFICE OF THE CITY ATTORNEY CITY OF SAN FRANCISCO CITY HALL ROOM 206 400 VAN NESS SAN FRANCISCO, CA 94102	COUNTY OF IMPERIAL COURTHOUSE, FLOOR 2 939 W. MAIN ST EL CENTRO, CA 92243	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF NEVADA COURTHOUSE ANNEX NEVADA CITY, CA 95959	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SONOMA 600 ADMINISTRATION DR. #212J SANTA ROSA, CA 95403	
OFFICE OF THE CITY ATTORNEY CITY OF SACRAMENTO 980 9 th Street, 10 th Floor SACRAMENTO, CA 95814	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF INYO P.O. DRAWER D INDEPENDENCE, CA 93526	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ORANGE 400 CIVIC CENTER DR WEST SANTA ANA, CA 92701	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF STANISLAUS 1100 I ST. #200 MODESTO, CA 95354	
OFFICE OF THE CITY ATTORNEY CITY OF SAN JOSE 151 W. MISSION ST. SAN JOSE, CA 95110	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF KERN 1215 TRUXTUN AVE. FLOOR 4 BAKERSFIELD, CA 93301	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF PLACER 11562 B AVE AUBURN, CA 95603-2687	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SUTTER 1160 CIVIC CENTER BLVD. #A YUBA CITY, CA 95993	
OFFICE OF THE CITY ATTORNEY CITY OF LOS ANGELES 200 N. MAIN ST. LOS ANGELES, CA 90012	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF KINGS 1400 W. LACEY BLVD. HANFORD, CA 93230	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF PLUMAS P.O. BOX 10716 QUINCY, CA 95971	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TEHAMA P.O. BOX 519 REDBLUFF, CA 96080	
OFFICE OF THE CITY ATTORNEY CITY OF SAN DIEGO 202 C ST. FLOOR 3 SAN DIEGO, CA 92101	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LAKE 255 N. FORBES ST # 424 LAKEPORT, CA 95453	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF RIVERSIDE 4075 MAIN ST. RIVERSIDE, CA 92501	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TRINITY P.O. BOX 310 WEAVERVILLE, CA 96093	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ALAMEDA 225 FALLON ST. #9 OAKLAND, CA 94612	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LASSEN COUNTY ADMINISTRATION BUILDING 707 NEVADA ST. SUSANVILLE, CA 96130	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SACRAMENTO P.O. BOX 749 SACRAMENTO, CA 95804	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TUOLUMNE 2 S. GREEN ST. SONORA, CA 95370	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ALPINE P.O. BOX 248 MARKLEEVILLE, CA 96120	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LOS ANGELES 18000 CRIMINAL COURTS BUILDING 210 W. TEMPLE ST. LOS ANGELES, CA 90012	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN BENITO 419 4TH ST HOLLISTER, CA 95023	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TULARE COURTHOUSE #224 VISALIA, CA 93291	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF AMADOR 108 COURT ST. SUITE 202 JACKSON, CA 95642	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIPOSA P.O. BOX 748 MARIPOSA, CA 95338	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN BERNARDINO 316 MT. VIEW AVE. SAN BERNARDINO, CA 92415-0004	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TUOLUMNE 2 S. GREEN ST. SONORA, CA 95370	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF BUTTE 25 COUNTY CENTER DR. OROVILLE, CA 95965	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MADERA 209 W. YOSEMITE AVE. MADERA, CA 93637	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN FRANCISCO 850 BRYANT ST #322 SAN FRANCISCO, CA 94103	VENTURA COUNTY DISTRICT ATTORNEY'S OFFICE c/o GREGORY BROSE D.D.A. 4245 MARKET ST. #205 VENTURA, CA 93003	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF CALAVERAS GOVERNMENT CENTER 891 MOUNTAIN RANCH ROAD SAN ANDREAS, CA 95249	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIN HALL OF JUSTICE #183 SAN RAFAEL, CA 94903	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN JOAQUIN 222 E. WEBER AVE #202 STOCKTON, CA 95202	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF YOLO 204 4TH ST P.O. BOX 1247 WOODLAND, CA 95695	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF COLUSA 547 MARKET ST. COLUSA, CA 95932	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIPOSA P.O. BOX 748 MARIPOSA, CA 95338	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN LUIS OBISPO COUNTY GOVERNMENT CENTER #450 SAN LUIS OBISPO, CA 93408	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF YUBA 215 5TH ST. MARYSVILLE, CA 95901	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF CONTRA COSTA P.O. BOX 670 MARTINEZ, CA 94553	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MENDOCINO 301 S. STATE ST. UKIAH, CA 95482	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SANTA BARBARA 1112 SANTA BARBARA ST. SANTA BARBARA, CA 93101-2008	JEAN-MARIE LE GUERN, CHAIRMAN MAUVIEL B.P. 28 ROUTE DE CAEN 50800 VILLEDIEU-LES-POËLES FRANCE	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF DEL NORTE 450 H ST #171 CRESCENT CITY, CA 95531	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MERCED 2222 M ST. MERCED, CA 95340	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN MATEO HALL OF JUSTICE AND RECORDS REDWOOD CITY, CA 94063	PRESIDENT OR CEO MAUVIEL USA, INC 802 CENTERPOINT BLVD NEW CASTLE, DE 19720	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF EL DORADO 515 MAIN ST. PLACERVILLE, CA 95667	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MODOC P.O. BOX 1171 ALTURAS, CA 9610	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SANTA CLARA 70 W. HEDDING ST. SAN JOSE, CA 95110	PRESIDENT OR CEO RUFFONI S.R.L. VIA MAGENTA, 5 PO BOX 11 28887 OMEGNA (Vb) ITALY	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF FRESNO 2220 TULARE ST #1000 FRESNO, CA 93721	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MONO P.O. BOX 617 BRIDGEPORT, CA 93517	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SHASTA 1525 COURT ST. REDDING, CA 96001	PHIL KAHN, PRESIDENT RUFFONI USA 20350 8TH STREET EAST SONOMA, CA 95476	
		OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SIERRA P.O. BOX 457 DOWNIEVILLE, CA 95936	PRESIDENT OR CEO RUFFONI COPPER USA 1108A EDGEHILL DRIVE BURLINGAME, CA 94010	
			FRANCIS STAUB, PRESIDENT STAUB USA 115 PINE AVENUE LONG BEACH, CA 90802	
			FRANCIS STAUB, PRESIDENT STAUB (en ALSACE) SERVICE CONSOMMATEURS 2 RUE SAINT GILLES 68230 TURKHEIM FRANCE	