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11 Attorneys for Plaintiff,
12 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF SAN FRANCISCO
15 (Unlimited Jurisdiction)

16 MATEEL ENVIRONMENTAL
17 JUSTICE FOUNDATION,

CASE NO. CGC-11-509694

18 Plaintiff,
19 v.

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

20 D & J LUMBER CO., INC.; FRIEDMAN'S
HOME IMPROVEMENT; PROBUILD
21 HOLDINGS, INC.; and SOARES LUMBER
& FENCING, INC.

TOXIC TORT/ENVIRONMENTAL

22 Defendants.
23 _____/

24 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

25 INTRODUCTION

26 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
27 failure of defendants D & J LUMBER CO., INC.; FRIEDMAN'S HOME IMPROVEMENT;
28 PROBUILD HOLDINGS, INC.; and SOARES LUMBER & FENCING, INC., (hereinafter

SUMMONS ISSUED

FILED

San Francisco County Superior Court

MAR 30 2011

CLERK OF THE COURT

BY: [Signature] Deputy Clerk

1 "Defendants"), to give clear and reasonable warnings to those residents of California, who handle
2 and use used railroad ties that doing so exposes them to benzo[b]fluoranthene,
3 benzo[k]fluoranthene, benzo[a]pyrene, chrysene, creosotes, dibenz[a,h]anthracene,
4 hexachlorobenzene, indeno[1,2,3-cd]pyrene, naphthalene, pentachlorophenol, polychlorinated
5 dibenzo-p-dioxins, polychlorinated dibenzofurans. Used railroad ties are wooden timbers treated
6 with creosote and/or pentachlorophenol, (hereinafter "carcinogens and teratogens "). These
7 timbers supported rails in the beds of a railroad tracks until they were salvaged, removed from
8 the roadbed, and then put on sale at defendants' businesses. These chemicals are known to the
9 State of California to cause cancer, birth defects and male and female reproductive toxicity.
10 Defendants recover , recycle, distribute, and/or market used railroad ties. These products cause
11 exposures to the chemicals used in treating used railroad ties. These chemicals are known to the
12 State of California to cause cancer, birth defects and other reproductive harm.

13 2. Defendants are businesses that manufacture, market, and/or distribute used
14 railroad ties. Defendants intend that residents of California handle and use used railroad ties that
15 Defendants manufacture, market, and/or distribute. When these products are handled and used in
16 their normally intended manner, they expose people to chemicals known to cause cancer and
17 birth defects—the chemicals that were used to treat the used railroad ties. The above-referenced
18 carcinogens and teratogens come off the used railroad ties and onto the hands of the people who
19 use, handle or come into contact with the used railroad ties. In spite of knowing that residents of
20 California were and are being exposed to these chemicals when they handle and use used railroad
21 ties, Defendants did not and do not provide clear and reasonable warnings that these products
22 cause exposure to chemicals known to cause cancer, birth defects and other reproductive harm.
23 The used railroad ties to which this Complaint pertains are those referenced in the Notice of
24 Violation letter, which is appended to and incorporated by reference into this Complaint.

25 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7
26 to compel Defendant to bring its business practices into compliance with section 25249.5 et seq.
27 by providing a clear and reasonable warning to each individual who has been and who in the
28 future may be exposed to the above mentioned chemicals known to cause cancer and birth

1 defects from the use of Defendants' products.

2 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure
3 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known
4 to cause cancer, birth defects and other reproductive harm. Plaintiff also seeks an order that
5 defendants identify and locate each individual person who in the past has purchased a used
6 railroad tie and to provide to each such purchaser a clear and reasonable warning that the used
7 railroad tie will cause exposures to chemicals known to cause cancer, birth defects and other
8 reproductive harm.

9 PARTIES

10 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")
11 is a non-profit organization dedicated to, among other causes, the protection of the environment,
12 promotion of human health, environmental education, and consumer rights. Mateel is based in
13 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a
14 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement
15 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of
16 California are regularly exposed to the above referenced carcinogens and teratogens from used
17 railroad ties manufactured, distributed or marketed by Defendants and are so exposed without a
18 clear and reasonable Proposition 65 warning.

19 6. Defendants are each persons doing business within the meaning of Health &
20 Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or
21 market used railroad ties in California, including the City and County of San Francisco.
22 Manufacture, distribution and/or marketing of these products in the City and County of San
23 Francisco and/or to people who live in San Francisco, causes people to be exposed to
24 carcinogens and teratogens while they are physically present in the City and County of San
25 Francisco.

26 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &
27 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference are copies of a
28 Notice of Violation letter, dated November 12, 2009, which Mateel sent to California's Attorney

1 General. On that same day, letters identical in substance were sent to every District Attorney in
2 the state, and to the City Attorneys of every California city with a population greater than
3 750,000. On the same day, Mateel sent identical Notices of Violation to Defendants. Attached
4 to the Notices of Violation sent to the Defendants was a summary of Proposition 65 that was
5 prepared by California's Office of Environmental Health Hazard Assessment. In addition, each
6 Notice of Violation letter that plaintiff sent was accompanied by a Certificate of Service attesting
7 to the service of the Notice of Violation letters on each entity which received it. Pursuant to
8 California Health & Safety Code Section 25249.7(d), a Certificate of Merit attesting to the
9 reasonable and meritorious basis for the action was also sent with each Notice of Violation.
10 Factual information sufficient to establish the basis of the Certificate of Merit was enclosed with
11 Notices of Violation Mateel sent to the Attorney General.

12 8. Defendants are businesses that employ more than ten people.

13 JURISDICTION

14 9. The Court has jurisdiction over this action pursuant to California Health & Safety
15 Code Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court
16 "original jurisdiction in all causes except those given by statute to other trial courts." Chapter 6.6
17 of the Health & Safety Code, which contains the statutes under which this action is brought, does
18 not grant jurisdiction to any other trial court.

19 10. This Court also has jurisdiction over Defendants because they are businesses that
20 have sufficient minimum contacts in California and within the City and County of San Francisco.
21 Defendants intentionally availed themselves of the California and San Francisco County markets
22 for used railroad ties. It is thus consistent with traditional notions of fair play and substantial
23 justice for the San Francisco Superior Court to exercise jurisdiction over them.

24 11. Venue is proper in this Court because Defendants market their products in and
25 around San Francisco and thus cause people to be exposed to chemicals known to cause cancer
26 and birth defects while those people are physically present in San Francisco. Liability for
27 Plaintiff's causes of action, or some parts thereof, has accordingly arisen in San Francisco during
28 the times relevant to this Complaint and Plaintiff seeks civil penalties and forfeitures imposed by

1 statutes.

2 FIRST CAUSE OF ACTION
3 (Claim for Injunctive Relief)

4 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, as
5 if specifically set forth herein, paragraphs 1 through 11, inclusive.

6 13. The People of the State of California have declared by referendum under
7 Proposition 65 (California Health & Safety Code § 25249.5 et seq.) their right "[t]o be informed
8 about exposures to chemicals that cause cancer, birth defects, and reproductive harm."

9 14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates
10 that persons who, in the course of doing business, knowingly and intentionally expose any
11 individual to a chemical known to the State of California to cause cancer or birth defects must
12 first provide a clear and reasonable warning to such individual prior to the exposure.

13 15. Since at least November 12, 2006, Defendants have engaged in conduct that
14 violates Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and
15 intentionally exposing to the above referenced carcinogens and teratogens those California
16 residents who handle and use used railroad ties. The normally intended use of used railroad ties
17 causes exposure to carcinogens and teratogens which are chemicals known to the State of
18 California to cause cancer, birth defects and other reproductive harm. Defendants have not
19 provided clear and reasonable warnings, within the meaning of Health & Safety Code Sections
20 25249.6 and 25249.11.

21 16. At all times relevant to this action, Defendants knew that the used railroad ties
22 they manufactured, distributed or marketed were causing exposures to chemicals known to cause
23 cancer and birth defects. Defendants intended that residents of California handle and use used
24 railroad ties in such ways as would lead to significant exposures to these chemicals.

25 17. By the above described acts, Defendants have violated Cal. Health & Safety Code
26 § 25249.6 and are therefore subject to an injunction ordering them to stop violating Proposition
27 65, to provide warnings to all present and future customers, and to provide warnings to their past
28 customers who purchased defendants' products without receiving a clear and reasonable warning.

SECOND CAUSE OF ACTION
(Claim for Civil Penalties)

18. Plaintiff realleges and incorporates by reference into this Second Cause of Action, as if specifically set forth herein, paragraphs 1 through 17, inclusive.

19. By the above described acts, Defendants are liable and should be liable pursuant to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each individual exposed without proper warning to chemicals known to cause birth defects from the handling or use of Defendants' used railroad ties.

PRAYER FOR RELIEF

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

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

B. 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 chemicals known to cause birth defects as the result of Defendants' manufacturing, distributing or marketing of used railroad ties;

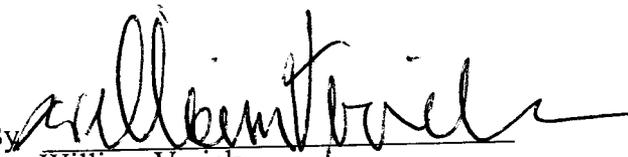
C. That Defendants be ordered to identify and locate each individual who purchased used railroad ties and provide a warning to each such person that the used railroad ties that person bought will expose that person to chemicals known to cause birth defects.

D. 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 22, 2011

KLAMATH ENVIRONMENTAL LAW CENTER

By 
William Verick
Attorney for Plaintiff
Mateel Environmental Justice Foundation

LAW OFFICE OF FREDRIC EVENSON

424 FIRST STREET
EUREKA, CALIFORNIA 95501
TELEPHONE (707) 268-8900 EX 2
FAX (707) 268-8901

November 12, 2009

PROPOSITION 65 ENFORCEMENT REPORTING
ATTENTION: PROP 65 COORDINATOR
1515 CLAY STREET, SUITE 2000
P.O. BOX 70550
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the private companies listed 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 for both Mateel and this office. The above referenced violations occur when California residents come into contact with used railroad ties the surfaces of which contain the following Proposition 65-listed chemicals: benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, chrysene, creosotes, dibenz[a,h]anthracene, hexachlorobenzene, indeno[1,2,3-cd]pyrene, naphthalene, pentachlorophenol, polychlorinated dibenzo-p-dioxins, polychlorinated dibenzofurans. Railroad ties are wooden timbers treated with creosote and/or pentachlorophenol. These timbers supported rails in the bed of a railroad track until they were salvaged and removed from the roadbed. These old railroad ties are sold by the listed companies mainly for gardening and landscaping purposes. The surfaces of these used railroad ties, which users of them contact, contain the above-listed Proposition 65-listed chemicals. When a user contacts these railroad ties, the chemicals are transferred from the railroad ties to the hands of the people contacting them. These chemicals come off on peoples' skin and then enter their bodies when the chemicals are absorbed directly through the skin, through mucous membranes, through wood splinters entering their bodies, or through cuts and/or abrasions and when they touch their hands to their mouths and other mucous membranes, or when they touch cigarettes or food and then smoke the cigarettes or ingest the food. These exposures thus occur via the dermal contact, dermal absorption, mucous membrane, subcutaneous, inhalation and ingestion routes. It is of note that most of these chemicals cause cancer from simple dermal contact. The listed companies did not and do not provide people with clear and reasonable warnings before they expose them to the above-referenced chemicals. The above referenced violations have occurred every day since at least November 12, 2006 and will continue every day until the warnings are given. These 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 of these products manufactured outside of California, except as to workplaces the businesses themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the properties of the listed businesses and in each of California's 58 counties.

Cordially,

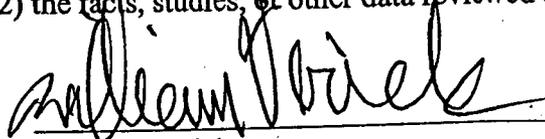


Fredric Evenson

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: November 12, 2009



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. On November 12, 2009, 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 November 12, 2009, 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 CITY ATTORNEY
CITY OF OAKLAND
505 14TH ST 12TH FLOOR
OAKLAND, CA 94612

OFFICE OF THE CITY ATTORNEY
CITY OF SAN FRANCISCO
CITY HALL ROOM 206
400 VAN NESS
SAN FRANCISCO, CA 94102

OFFICE OF THE CITY ATTORNEY
CITY OF SACRAMENTO
PO BOX 1948
SACRAMENTO, CA 95812-1948

OFFICE OF THE CITY ATTORNEY
CITY OF SAN JOSE
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113

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 CONSUMER &
ENVIRONMENTAL PROTECTION
1200 THIRD AVENUE, SUITE 700
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF ALAMEDA
1225 FALLON STREET ROOM 900
OAKLAND, CA 94612

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF ALPINE
P.O. BOX 248
MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF AMADOR
708 COURT STREET
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
ATTORNEY
COUNTY OF COLUSA
547 MARKET STREET
COLUSA, CA 95932

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

OFFICE OF THE DISTRICT
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

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF HUMBOLDT
825 5TH ST.
EUREKA, CA 95501

COUNTY OF IMPERIAL
COURTHOUSE, FLOOR 2
939 W. MAIN ST
EL CENTRO, CA 92243

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF INYO
P.O. DRAWER D
INDEPENDENCE, CA 93526

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF KERN
1215 TRUXTUN AVE. FLOOR 4
BAKERSFIELD, CA 93301

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

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

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF LASSEN
220 SOUTH LASSEN ST. STE 8
SUSANVILLE, CA 96130

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 MADERA
209 W. YOSEMITE AVE.
MADERA, CA 93637

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF MARIN
HALL OF JUSTICE #183
SAN RAFAEL, CA 94903

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF MARIPOSA
P.O. BOX 730
MARIPOSA, CA 95338

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF MENDOCINO
PO BOX 1000
UKIAH, CA 95482

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF MERCED
2222 M ST.
MERCED, CA 95340

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF MODOC
204 SOUTH COURT STREET
ALTURAS, CA 96101

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF MONO
P.O. BOX 617
BRIDGEPORT, CA 93517

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF MONTEREY
240 CHURCH STREET
P.O. BOX 1131
SALINAS, CA 93902

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931 PARKWAY MALL
P.O. BOX 720
NAPA, CA 94559-0720

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF NEVADA
110 UNION STREET
NEVADA CITY, CA 95959

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF ORANGE
401 CIVIC CENTER DR WEST
SANTA ANA, CA 92701

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF PLACER
10810 JUSTICE CENTER DR., STE 240
ROSEVILLE, CA 95678

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COUNTY OF PLUMAS
520 MAIN STREET #404
QUINCY, CA 95971

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4075 MAIN ST.
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COUNTY OF SACRAMENTO
901 G STREET
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419 4TH ST
HOLLISTER, CA 95023

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316 MT. VIEW AVE.
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850 BRYANT ST #322
SAN FRANCISCO, CA 94103

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SAN JOAQUIN
222 E. WEBER AVE #202
STOCKTON, CA 95202

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SAN LUIS OBISPO
COUNTY GOVERNMENT CENTER #450
SAN LUIS OBISPO, CA 93408

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COUNTY OF SAN MATEO
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REDWOOD CITY, CA 94063

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SANTA BARBARA
1112 SANTA BARBARA ST.
SANTA BARBARA, CA 93101

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SANTA CLARA
70 W. HEDDING ST.
SAN JOSE, CA 95110

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SANTA CRUZ
701 OCEAN ST. #200
SANTA CRUZ, CA 95060

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SHASTA
1525 COURT ST.
REDDING, CA 96001

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SIERRA
P.O. BOX 457
DOWNTOWNEVILLE, CA 95936

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SISKIYOU
P.O. BOX 986
YREKA, CA 96097

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SOLANO
600 UNION AVE
FAIRFIELD, CA 94533

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SONOMA
600 ADMINISTRATION DR. #212J
SANTA ROSA, CA 95403

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF STANISLAUS
1100 I ST. #200
MODESTO, CA 95354

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SUTTER
1160 CIVIC CENTER BLVD. #A
YUBA CITY, CA 95993

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF TEHAMA
P.O. BOX 519
REDBLUFF, CA 96080

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF TRINITY
P.O. BOX 310
WEAVERVILLE, CA 96093

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

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF TUOLUMNE
2 S. GREEN ST.
SONORA, CA 95370

VENTURA COUNTY DISTRICT ATTORNEY'S
OFFICE
800 SOUTH VICTORIA AVE
VENTURA, CA 93009

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YOLO
301 SECOND STREET
WOODLAND, CA 95695

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

SERVICE LIST (Cont.)

MORRIS H KULMER, CEO
A & K RAILROAD MATERIALS, INC.
1505 S REDWOOD RD
SALT LAKE CITY, UT 84104

DAVID ANAWALT, CEO
ANAWALT LUMBER CO., INC.
11060 W FICO BLVD
LOS ANGELES, CA 90064

RICHARD SANTEE, CEO
APTO'S LANDSCAPE SUPPLY, INC.
CABRILLO SAND & GRAVEL
5035 FREEDOM BLVD
APTO'S, CA 95003

JEFFREY O HOGAN, CEO
ASHBY LUMBER COMPANY
5818 MACANDREW
OAKLAND, CA 94611

FRANK MCCRARY, CEO
BIG CREEK LUMBER COMPANY
3564 HWY 1
DAVENPORT, CA 95017

EVA HELENE SCHLOSSER, CEO
BROADMOOR LUMBER & PLYWOOD CO.
1350 EL CAMINO REAL
SOUTH SAN FRANCISCO, CA 94080

DARRYL THOM, CEO
BRUCE BAUER LUMBER COMPANY OF
CALIFORNIA
134 SAN ANTONIO CIR
MOUNTAIN VIEW, CA 94040

ORIN R BURGESS, CEO
BURGESS LUMBER
3610 COPPERHILL LN
SANTA ROSA, CA 95403

WILLIAM C MEEK, CEO
C. C. M. CORPORATION
1651 RESPONSE RD STE 200
SACRAMENTO, CA 95815-5253

LESLIE A CRANDALL, CEO
CARLSBAD ROCK & SUPPLY
DBA ARGO STONE AND SUPPLY
COMPANY CO.
2609 INDUSTRY STREET
OCEANSIDE, CA 92054

STEPHEN PATTERSON, CEO
CENTRAL VALLEY BUILDERS SUPPLY
1100 VINTAGE AVE
ST HELENA, CA 94574

MICHAEL JOHNSON, CEO
D & J LUMBER CO., INC.
600 TENNANT AVE
MORGAN HILL, CA 95037

EUGENE P DOLAN, CEO
DOLANS OF PINOLE LUMBER AND
BUILDING MATERIALS CO.
4252 ELARIO LANE
CONCORD, CA 94518

EUGENE P DOLAN, CEO
DOLANS OF CONCORD
4252 ELARIO LANE
CONCORD, CA 94518

JOHN W BACON, SR., CEO
ECONOMY LUMBER CO. OF OAKLAND
750 HIGH ST
OAKLAND, CA 94601

AUGUST VENEZIA, CEO
FAIRFAX BUILDING SUPPLY CO., INC.
90 JACKSON DR
NOVATO, CA 94947

AUGUST VENEZIA, CEO
FAIRFAX BUILDING SUPPLY CO., INC.
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