

ENDORSED  
FILED  
SAN FRANCISCO COUNTY  
SUPERIOR COURT

2011 MAR 10 PM 2:12

CLERK OF THE COURT

BY: DEPUTY CLERK

D. STIERPE

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10 brianacree@earthlink.net

11 Attorneys for Plaintiff,  
MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SAN FRANCISCO  
(Unlimited Jurisdiction)

CGC-11-509071

16 MATEEL ENVIRONMENTAL  
17 JUSTICE FOUNDATION,

CASE NO.

18 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

19 v.

20 BED BATH & BEYOND, INC. and SUR LA  
21 TABLE, INC.  
22 Defendants.

TOXIC TORT/ENVIRONMENTAL

23 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 BED BATH & BEYOND, INC. and SUR LA TABLE, INC., (hereinafter  
28 "Defendants"), to give clear and reasonable warnings to those residents of California, who handle

1 and use brass cookware such as pepper mills. These products or their components are made of  
2 leaded-brass or bronze, (hereinafter “brass cookware”). Handling this cookware, and eating or  
3 drinking food that has been prepared with it, causes those residents to be exposed to lead and  
4 lead compounds, lead acetate, lead phosphate, and lead subacetate (hereinafter, collectively,  
5 “lead”). The types of products to which this Complaint pertains are those types listed in the  
6 Product Lists appended to the Proposition 65 Notice of Violation Letter that is attached to and  
7 incorporated by reference into this Complaint. Lead is known to the State of California to cause  
8 cancer, birth defects and male and female reproductive toxicity. Defendants market leaded brass  
9 cookware. These products cause exposures to lead and lead compounds, which are chemicals  
10 known to the State of California to cause cancer, birth defects and other reproductive harm.

11 2. Defendants are businesses that market and/or distribute leaded brass cookware.  
12 Defendants intend that residents of California handle and eat food that has been prepared with  
13 leaded brass cookware that Defendants market and/or distribute. When these products are  
14 handled and used in their normally intended manner, they expose people to lead. In spite of  
15 knowing that residents of California were and are being exposed to these chemicals when they  
16 handle and use leaded brass cookware, Defendants did not and do not provide clear and  
17 reasonable warnings that these products cause exposure to chemicals known to cause cancer,  
18 birth defects and other reproductive harm.

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

27 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure  
28 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known

1 to cause cancer, birth defects and other reproductive harm.

2 PARTIES

3 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")  
4 is a non-profit organization dedicated to, among other causes, the protection of the environment,  
5 promotion of human health, environmental education, and consumer rights. Mateel is based in  
6 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a  
7 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement  
8 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of  
9 California are regularly exposed to lead and lead compounds from leaded brass cookware  
10 marketed by Defendants and are so exposed without a clear and reasonable Proposition 65  
11 warning.

12 6. Defendants are each a person doing business within the meaning of Health &  
13 Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or  
14 market leaded brass cookware in California, including in the City and County of San Francisco.  
15 Manufacture, distribution and/or marketing of these products in the City and County of San  
16 Francisco and/or to people who live in San Francisco, causes people to be exposed to lead and  
17 lead compounds while they are physically present in the City and County of San Francisco.

18 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &  
19 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a  
20 Notice of Violation Letter dated November 18, 2010, which Mateel sent to California's Attorney  
21 General. Substantially identical letters were sent to every District Attorney in the state, and to the  
22 City Attorneys of every California city with a population greater than 750,000. On that same  
23 day, Mateel sent a substantively identical Notice of Violation Letter to each defendant. Attached  
24 to the Notice of Violation Letter sent to each defendant was a summary of Proposition 65 that  
25 was prepared by California's Office of Environmental Health Hazard Assessment. In addition,  
26 each Notice of Violation Letter plaintiff sent was accompanied by a Certificate of Service  
27 attesting to the service of the Notice of Violation Letter on each entity which received it.  
28 Pursuant to California Health & Safety Code Section 25249.7(d), a Certificate of Merit attesting

1 to the reasonable and meritorious basis for the action was also sent with each Notice of Violation  
2 Letter. Factual information sufficient to establish the basis of the Certificate of Merit was  
3 enclosed with the Notice of Violation Letter Mateel sent to the Attorney General.

4 8. Defendants are all businesses that employ more than ten people.

5 JURISDICTION

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

11 10. This Court also has jurisdiction over Defendants because they are businesses that  
12 have sufficient minimum contacts in California and within the City and County of San Francisco.  
13 Defendants intentionally availed themselves of the California and San Francisco County markets  
14 for leaded brass cookware. It is thus consistent with traditional notions of fair play and  
15 substantial justice for the San Francisco Superior Court to exercise jurisdiction over them.

16 11. Venue is proper in the City and County of San Francisco because Defendants  
17 market their products in and around San Francisco and thus cause people to be exposed to lead  
18 and lead compounds while those people are physically present in San Francisco. Liability for  
19 Plaintiff's causes of action, or some parts thereof, has accordingly arisen in San Francisco during  
20 the times relevant to this Complaint and Plaintiff seeks civil penalties and forfeitures imposed by  
21 statutes.

22 FIRST CAUSE OF ACTION  
23 (Claim for Injunctive Relief)

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

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

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

5 15. Since at least November 18, 2007, Defendants have engaged in conduct that  
6 violates Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and  
7 intentionally exposing to the above mentioned toxic chemicals, those California residents who  
8 handle and eat food prepared with leaded brass cookware . The normally intended use of leaded  
9 brass cookware causes exposure to lead and lead compounds, which are chemicals known to the  
10 State of California to cause cancer, birth defects and other reproductive harm. Defendants have  
11 not provided clear and reasonable warnings, within the meaning of Health & Safety Code  
12 Sections 25249.6 and 25249.11.

13 16. At all times relevant to this action, Defendants knew that the leaded brass  
14 cookware they marketed was causing exposures to lead and lead compounds. Defendants  
15 intended that residents of California handle and use leaded brass cookware in such ways as  
16 would lead to significant exposures to these chemicals.

17 17. By the above described acts, Defendants have violated Cal. Health & Safety Code  
18 § 25249.6 and are therefore subject to an injunction ordering them to stop violating Proposition  
19 65 and requiring them to provide warnings to their past customers who purchased defendants'  
20 products without receiving a clear and 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 17, 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  
28 of Defendants' leaded brass cookware .

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' marketing of leaded brass cookware;

10 3. That Defendants be ordered to identify and locate each individual who purchased  
11 leaded brass cookware and provide a warning to each such person that the leaded brass cookware  
12 the person purchased will expose that person to chemicals known to cause birth defects.

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

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

16 Dated: February 2, 2011

KLAMATH ENVIRONMENTAL LAW CENTER

17  
18  
19 By 

William Verick

Attorney for Plaintiff

Mateel Environmental Justice Foundation



# Klamath

ENVIRONMENTAL  
LAW CENTER

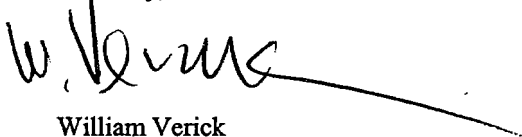
November 18, 2010

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 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 peppermills these companies market. A list of specific examples of the specific types of products at issue is attached. Though a specific model or UPC number may be given as an example, this notice pertains to all similar types of brass peppermills. These products 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 peppermills, such as when buying them, stocking shelves with them, while cooking with them, and while seasoning their food with them. 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, mucous membrane, ingestion and inhalation routes. The listed companies 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 November 18, 2007, and will continue every day until the lead is removed from the brass peppermills, 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 products made outside of California, except as to workplaces these businesses themselves maintain in California. This notice does not allege any environmental exposure violations.

Cordially,

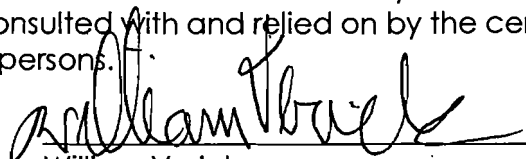


William Verick

**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 18, 2010



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 November 18, 2010, 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 18, 2010, at Eureka, California.



Nicole Frank



## PRODUCT LIST

### **BED BATH & BEYOND, INC.**

#103 ATLAS PEPPER MILL 8" UPC CODE: 764443 001030 This product description pertains not only to the specific model of the product listed, but also for all units of all models of brass peppermills.

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

#404 ATLAS COPPER PEPPER MILL 9" UPC CODE: 764443 004048 This product description pertains not only to the specific model of the product listed, but also for all units of all models of brass peppermills.

# SERVICE LIST

PROPOSITION 65 ENFORCEMENT  
REPORTING  
ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
POST OFFICE 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

COUNTY OF NAPA  
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

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF PLUMAS  
520 MAIN STREET #404  
QUINCY, CA 95971

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF RIVERSIDE  
4075 MAIN ST.  
RIVERSIDE, CA 92501

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SACRAMENTO  
901 G STREET  
SACRAMENTO, CA 95814

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN BENITO  
419 4TH ST  
HOLLISTER, CA 95023

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 SAN DIEGO  
330 W. BROADWAY, SUITE 1100  
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN FRANCISCO  
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

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN MATEO  
HALL OF JUSTICE AND RECORDS  
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  
DOWNIEVILLE, 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 95973

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

STEVEN TEMARES, CEO  
BED BATH & BEYOND INC.  
650 LIBERTY AVENUE  
UNION, NJ 07083

JACK SCHWEFEL, CEO  
SUR LA TABLE, INC.  
5701 SIXTH AVE SOUTH #486  
SEATTLE, WA 98108