

ENDORSED  
FILED  
ALAMEDA COUNTY

MAY - 4 2012

CLERK OF THE SUPERIOR COURT  
By ~~Barbara~~ LaMotte Deputy

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2 Law Office of Michael Freund  
3 1919 Addison Street, Suite 105  
4 Berkeley, CA 94704  
5 Telephone: (510) 540-1992  
6 Facsimile: (510) 540-5543

7 Attorney for Plaintiff Environmental Research Center

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF ALAMEDA**

11 **ENVIRONMENTAL RESEARCH CENTER,**  
12 **a California non-profit corporation**

Case No. **RG12628911**

13 **Plaintiff**

**COMPLAINT FOR INJUNCTIVE  
AND DECLARATORY RELIEF  
AND CIVIL PENALTIES**

14 **v.**

15 **FOODSCIENCE CORPORATION and**  
16 **DOES 1-100**

[Miscellaneous Civil Complaint (42)]  
Proposition 65, Health & Safety Code  
Section 25249.5 et seq.]

17 **Defendants.**  
18 \_\_\_\_\_ /

19  
20 Plaintiff Environmental Research Center hereby alleges:

21  
22 **I**

23 **INTRODUCTION**

24  
25 1. Plaintiff Environmental Research Center (hereinafter "Plaintiff" or "ERC") brings this  
26 action as a private attorney general enforcer and in the public interest pursuant to Health & Safety  
27 Code Section 25249.7 (d). This complaint seeks injunctive and declaratory relief and civil penalties  
28 to remedy FoodScience Corporation's ("FoodScience") failure to warn consumers that they have

1 been exposed to lead from several of the company’s nutritional health products. Lead is a chemical  
2 known to the State of California to cause cancer, birth defects and other reproductive harm. Based  
3 on the Safe Drinking Water and Toxic Enforcement Act of 1986 (Health & Safety Code Section  
4 25249.5 et seq.) also known as “Proposition 65,” businesses with ten or more employees must  
5 provide a “clear and reasonable warning” prior to exposing persons to these chemicals.  
6

7 **II**

8 **PARTIES**

9  
10 2. Plaintiff ERC is a California non-profit corporation dedicated to, among other causes, helping  
11 safeguard the public from health hazards by bringing about a reduction in the use and misuse of  
12 hazardous and toxic chemicals, facilitating a safe environment for consumers and employees and  
13 encouraging corporate responsibility.

14 3. Defendant FoodScience is a business that manufactures, distributes and/or sells various  
15 nutritional health products that have exposed users to lead in the State of California within the  
16 relevant statute of limitations period. These products include FoodScience of Vermont G.I.  
17 Benefits; FoodScience Corp. Mountain Naturals of Vermont Chitolean; FoodScience Corp.  
18 Mountain Naturals of Vermont Citrin Plus; FoodScience Corp. Mountain Naturals of Vermont  
19 Para-Safe; FoodScience Corp. Mountain Naturals of Vermont Superior Oranges; and FoodScience  
20 Corp. Mountain Naturals of Vermont Superior Greens Detoxifier (“Covered Products”).  
21

22 FoodScience is a company subject to Proposition 65 as it employs ten or more persons.  
23

24 4. Defendants Does I-100, are named herein under fictitious names, as their true names and  
25 capacities are unknown to Plaintiff. ERC is informed and believes, and thereon alleges, that each  
26 of said Does is responsible, in some actionable manner, for the events and happenings hereinafter  
27 referred to, either through said Defendant’s conduct, or through the conduct of its agents, servants or  
28

1 employees, or in some other manner, causing the harms alleged by ERC in this complaint. When  
2 said true names and capacities of Does are ascertained, ERC will seek leave to amend this complaint  
3 to set forth the same.  
4

5 **III**

6 **JURISDICTION AND VENUE**

7 5. This Court has jurisdiction pursuant to California Constitution Article VI, Section 10 because  
8 this case is a cause not given by statute to other trial courts.  
9

10 6. The Complaint is based on allegations contained in the Notice of Violation dated April 15,  
11 2011, served on the California Attorney General, other public enforcers and FoodScience. A  
12 true and correct copy of the Notices of Violation is attached hereto as Exhibit A. More than 60  
13 days have passed since the Notices of Violation were mailed and no public enforcement entity  
14 has filed a complaint in this case.  
15

16 7. This Court is the proper venue for the action because the causes of action have arisen in the  
17 County of Alameda where some of the violations of law have occurred. Furthermore, this Court is  
18 the proper venue under Code of Civil Procedure Section 395.5 and Health & Safety Code Section  
19 25249.7.  
20

21 **IV**

22 **STATUTORY BACKGROUND**

23 **A. Proposition 65**

24 8. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute passed as  
25 “Proposition 65” by an overwhelming majority vote of the people in November of 1986.  
26

27 9. The warning requirement of Proposition 65 is contained in Health & Safety Code Section  
28 25249.6, which provides:

1 No person in the course of doing business shall knowingly and intentionally expose any  
2 individual to a chemical known to the state to cause cancer or reproductive toxicity without first  
3 giving clear and reasonable warning to such individual, except as provided in Section 25249.10.

4 10. Implementing regulations for Proposition 65 provide that warnings are required for consumer  
5 product exposures. A “consumer product exposure is an exposure which results from a person’s  
6 acquisition, purchase, storage, consumption, or other reasonably foreseeable use of a consumer  
7 good, or any exposure that results from receiving a consumer service.” 27 CCR Section 25601 (b).

8 11. Whenever a clear and reasonable warning is required under Health & Safety Code Section  
9 25249.6, the “method employed to transmit the warning must be reasonably calculated considering  
10 the alternative methods available under the circumstances, to make the warning message available  
11 prior to exposure.” 27 CCR Section 25601. The warning requirement may be satisfied by a  
12 warning that appears on a product’s label or other labeling, shelf labeling, signs, a system of signs,  
13 public advertising identifying the system and toll-free information services, or any other, system,  
14 that provides clear and reasonable warnings. Id., Section 25603.1 (a) – (d).

15 12. Proposition 65 establishes a procedure by which the State is to develop a list of  
16 chemicals “known to the State to cause cancer or reproductive toxicity.” Health & Safety Code  
17 Section 25249.8. There is no duty to provide a clear and reasonable warning until 12-months after  
18 the chemical was published on the State list. Id., Section 25249.10 (b). Lead was listed as a  
19 chemical known to the State of California to cause developmental toxicity and male and female  
20 reproductive toxicity on February 27, 1987. Lead was listed as a chemical known to the State of  
21 California to cause cancer on October 1, 1992. Title 27, Cal. Code Regs. Section 27001.

22 13. Proposition 65 may be enforced by any person in the public interest who provides notice  
23 sixty days before filing suit to both the violator and designated law enforcement officials. The  
24 failure of law enforcement officials to file a timely complaint enables a citizen suit to be filed  
25  
26  
27  
28

1 pursuant to Health & Safety Code Section 25249.7 (c).

2 14. Proposition 65 provides that any person “violating or threatening to violate” Proposition 65  
3 may be enjoined in any court of competent jurisdiction. Health & Safety Code Section 25249.7 (a).  
4 To “threaten to violate” means “to create a condition in which there is a substantial probability that a  
5 violation will occur.” Id., Section 25249.11 (e). Furthermore, violators are subject to a civil penalty  
6 of up to \$2,500 per day for each violation. Id., Section 25249.7 (b).  
7

8 **V**

9 **STATEMENT OF FACTS**

10  
11 15. FoodScience has manufactured, distributed and/or sold the Covered Products  
12 containing lead to the State of California. Consumers have been ingesting these products for  
13 many years, without any knowledge of their exposure to lead, a very dangerous chemical.

14 16. For many years, FoodScience has knowingly and intentionally exposed numerous persons  
15 to lead, without providing a Proposition 65 warning. Prior to ERC’s Notice of Violation,  
16 FoodScience failed to provide a warning on the label of the Covered Products, nor was there any  
17 mention on the company’s website that the products contained lead. FoodScience has at all times  
18 relevant hereto been aware that the Covered Products contained lead and that persons using these  
19 products have been exposed to the chemical. FoodScience’s website represents to the public that it  
20 provides the highest quality formulations in the nutritional supplement industry and that the  
21 products contain only the purest and most potent raw ingredients. FoodScience has been aware of  
22 the lead in the Covered Products and has failed to disclose the presence of this chemical to the  
23 public, who undoubtedly believed they have been ingesting totally healthy and pure products.

24  
25  
26 17. Prior to ERC’s Notice of Violation, FoodScience failed to provide consumers of the  
27 Covered Products with a clear and reasonable warning that they have been exposed to a chemical  
28

1 known to the State of California to cause cancer, birth defects and other reproductive harm.

2  
3  
4 **FIRST CAUSE OF ACTION**

5 **(Violation of Section 25249.6 of the Health and Safety Code, Failure to Provide Clear**  
6 **and Reasonable Warning under Proposition 65)**

7 18. ERC refers to paragraphs 1-17, inclusive, and incorporates them herein by this reference.

8 19. By committing the acts alleged above, FoodScience has, in the course of doing business,  
9 knowingly and intentionally exposed users of the Covered Products to lead, a chemical known to  
10 the State of California to cause cancer, birth defects and other reproductive harm without first giving  
11 clear and reasonable warning to such individuals, within the meaning of Health & Safety Code  
12 Section 25249.6.  
13

14 20. Said violations render FoodScience liable for civil penalties up to \$2,500 (two thousand,  
15 five hundred dollars) per day, for each violation.

16 **SECOND CAUSE OF ACTION**

17 **(Declaratory Relief)**

18 22. ERC refers to paragraphs 1-21, inclusive, and incorporates them herein by this reference.

19 23. There exists an actual controversy relating to the legal rights and duties of the parties, within  
20 the meaning of Code of Civil Procedure Section 1060, between ERC and FoodScience concerning:  
21

22 a) whether FoodScience has exposed individuals to a chemical known to the State of  
23 California to cause cancer, birth defects and other reproductive harm without providing clear and  
24 reasonable warning.  
25

26 **VI**

27 **PRAYER**

28 WHEREFORE ERC prays for relief as follows:

1 1. On the First Cause of Action, for civil penalties for each and every violation according to  
2 proof;

3 2. On the First Cause of Action, and pursuant to Health & Safety Code Section 25249.7 (a), for  
4 such temporary restraining orders, preliminary and permanent injunctive orders, or other orders,  
5 prohibiting FoodScience from exposing persons to lead without providing clear and reasonable  
6 warning;  
7

8 3. On the Second Cause of Action, for a declaratory judgment pursuant to Code of Civil  
9 Procedure Section 1060 declaring:  
10

11 a. that FoodScience has exposed individuals to a chemical known to the State of California  
12 to cause, birth defects and other reproductive harm without providing clear and reasonable warning;  
13 and

14 4. On all Causes of Action, for reasonable attorneys' fees pursuant to Section 1021.5 of the Code  
15 of Civil Procedure or the substantial benefit theory;

16 5. For costs of suit herein; and

17 6. For such other relief as the Court may deem just and proper.  
18

19 Dated: May 4, 2012

20  
21 

22 \_\_\_\_\_  
23 Michael Freund



## Environmental Research Center

5694 Mission Center Road #199

San Diego, CA 92108

619.309.4194

April 15, 2011

### VIA CERTIFIED MAIL

Current CEO or President  
FoodScience Corporation  
20 New England Drive, Suite 10  
Essex Junction, VT 05452

Claudia Orlandi  
(FoodScience Corporation's Registered  
Agent for Service of Process)  
20 New England Drive  
Essex Junction, VT 05452

Office of the California Attorney General  
Prop 65 Enforcement Reporting  
1515 Clay Street, Suite 2000  
P.O. Box 70550  
Oakland, CA 94612-0550

### VIA PRIORITY MAIL

District Attorneys of All California Counties  
and Select City Attorneys  
(See Attached Certificate of Service)

### **Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.***

Dear Addressees:

I am the Executive Director of the Environmental Research Center ("ERC") in connection with this Notice of Violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

EXHIBIT A



The name of the Company covered by this Notice that violated Proposition 65 is:

**FoodScience Corporation**

The products that are the subject of this Notice and the chemical in those products identified as exceeding allowable levels are:

**FoodScience Of Vermont G.I. Benefits - Lead**  
**FoodScience Corp. Mountain Naturals Of Vermont Chitolean - Lead**  
**FoodScience Corp. Mountain Naturals Of Vermont Citrin Plus - Lead**  
**FoodScience Corp. Mountain Naturals Of Vermont Para-Safe - Lead**  
**FoodScience Corp. Mountain Naturals Of Vermont Superior Oranges - Lead**  
**FoodScience Corp. Mountain Naturals Of Vermont Superior Greens  
Detoxifier - Lead**

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead as chemical known to cause cancer.

This letter is a Notice to FoodScience Corporation and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This Notice covers all violations of Proposition 65 involving FoodScience Corporation currently known to ERC from the information now available. ERC may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, has been provided to the Noticed Company with a copy of this letter.

FoodScience Corporation has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemicals. The primary route of exposure to these chemicals has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemicals. The method of warning should be a warning that appears on the product's label. FoodScience Corporation violated Proposition 65 because the Company has failed to provide an appropriate warning to persons using these products that they are being exposed to the identified chemical.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this Notice unless FoodScience Corporation agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; and (2) pay an appropriate civil penalty. Consistent with the public interest goals of Proposition 65 and ERC's objectives in pursuing this Notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

April 15, 2011

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Please direct all questions concerning this notice to ERC's attorney, Michael Freund, address: 1915 Addison Street, Berkley, California, 94704-1101, telephone no.: 510-540-1992, e-mail: Freund1@aol.com.

Sincerely,



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Chris Heptinstall  
Executive Director  
Environmental Research Center

cc: Karen Evans

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to FoodScience Corporation and its Registered Agent for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

**CERTIFICATE OF MERIT**

**Re: Environmental Research Center's Notice of Proposition 65 Violations by FoodScience Corporation**

I, Michael Freund, declare:

1. This Certificate of Merit accompanies the attached sixty-day Notice in which it is alleged the party identified in the Notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney for the noticing party.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the Notice.
4. Based on the information obtained through those consultants, and on 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 plaintiff's case can be established and that the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.
5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this Certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: April 15, 2011



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Michael Freund  
Attorney for Environmental Research Center

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742

On April 15, 2011, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY"** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a US Postal Service Office for delivery by Certified Mail:

Current CEO or President  
FoodScience Corporation  
20 New England Drive, Suite 10  
Essex Junction, VT 05452

Claudia Orlandi  
(FoodScience Corporation's Registered  
Agent for Service of Process)  
20 New England Drive  
Essex Junction, VT 05452

On April 15, 2011, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a US Postal Service Office for delivery by Certified Mail:

Office of the California Attorney General  
Prop 65 Enforcement Reporting  
1515 Clay Street, Suite 2000  
Post Office Box 70550  
Oakland, CA 94612-0550

On April 15, 2011, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it with the U.S. Postal Service for delivery by Priority Mail.

Executed on April 15, 2011, in Fort Oglethorpe, Georgia.



Chris Heptinstall

**Service List**

District Attorney, Alameda County  
1225 Fallon Street, Room 900  
Oakland, CA 94612

District Attorney, Alpine County  
P.O. Box 248  
Markleeville, CA 96120

District Attorney, Amador County  
708 Court Street, #202  
Jackson, CA 95642

District Attorney, Butte County  
25 County Center Drive  
Oroville, CA 95965

District Attorney, Calaveras County  
891 Mountain Ranch Road  
San Andreas, CA 95249

District Attorney, Colusa County  
547 Market Street  
Colusa, CA 95932

District Attorney, Contra Costa County  
900 Ward Street  
Martinez, CA 94553

District Attorney, Del Norte County  
450 H Street, Ste. 171  
Crescent City, CA 95531

District Attorney, El Dorado County  
515 Main Street  
Placerville, CA 95667

District Attorney, Fresno County  
2220 Tulare Street, #1000  
Fresno, CA 93721

District Attorney, Glenn County  
Post Office Box 430  
Willows, CA 95988

District Attorney, Humboldt County  
825 5th Street  
Eureka, CA 95501

District Attorney, Imperial County  
939 West Main Street, Ste 102  
El Centro, CA 92243

District Attorney, Inyo County  
230 W. Line Street  
Bishop, CA 93514

District Attorney, Kern County  
1215 Truxtun Avenue  
Bakersfield, CA 93301

District Attorney, Kings County  
1400 West Lacey Boulevard  
Hanford, CA 93230

District Attorney, Lake County  
255 N. Forbes Street  
Lakeport, CA 95453

District Attorney, Lassen County  
220 South Lassen Street, Ste. 8  
Susanville, CA 96130

District Attorney, Los Angeles County  
210 West Temple Street, Rm 345  
Los Angeles, CA 90012

District Attorney, Madera County  
209 West Yosemite Avenue  
Madera, CA 93637

District Attorney, Marin County  
3501 Civic Center, Room 130  
San Rafael, CA 94903

District Attorney, Mariposa County  
Post Office Box 730  
Mariposa, CA 95338

District Attorney, Mendocino County  
Post Office Box 1000  
Ukiah, CA 95482

District Attorney, Merced County  
2222 M Street  
Merced, CA 95340

District Attorney, Modoc County  
204 S Court Street, Room 202  
Alturas, CA 96101-4020

District Attorney, Mono County  
Post Office Box 617  
Bridgeport, CA 93517

District Attorney, Monterey County  
230 Church Street, Bldg 2  
Salinas, CA 93901

District Attorney, Napa County  
931 Parkway Mall  
Napa, CA 94559

District Attorney, Nevada County  
110 Union Street  
Nevada City, CA 95959

District Attorney, Orange County  
401 Civic Center Drive West  
Santa Ana, CA 92701

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

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District Attorney, Placer County  
10810 Justice Center Drive, Ste 240  
Roseville, CA 95678

District Attorney, Plumas County  
520 Main Street, Room 404  
Quincy, CA 95971

District Attorney, Riverside County  
4075 Main Street, 1st Floor  
Riverside, CA 92501

District Attorney, Sacramento County  
901 "G" Street  
Sacramento, CA 9581

District Attorney, San Benito County  
419 Fourth Street, 2<sup>nd</sup> Floor  
Hollister, CA 95023

District Attorney, San Bernardino County  
316 N. Mountain View Avenue  
San Bernardino, CA 92415-0004

District Attorney, San Diego County  
330 West Broadway, Room 1300  
San Diego, CA 92101

District Attorney, San Francisco County  
850 Bryant Street, Room 325  
San Francisco, CA 94103

District Attorney, San Joaquin County  
Post Office Box 990  
Stockton, CA 95201

District Attorney, San Luis Obispo County  
1050 Monterey Street, Room 450  
San Luis Obispo, CA 93408

District Attorney, San Mateo County  
400 County Ctr., 3<sup>rd</sup> Floor  
Redwood City, CA 94063

District Attorney, Santa Barbara County  
1105 Santa Barbara Street  
Santa Barbara, CA 93101

District Attorney, Santa Clara County  
70 West Hedding Street  
San Jose, CA 95110

District Attorney, Santa Cruz County  
701 Ocean Street, Room 200  
Santa Cruz, CA 95060

District Attorney, Shasta County  
1525 Court Street, Third Floor  
Redding, CA 96001-1632

District Attorney, Sierra County  
PO Box 457  
Downieville, CA 95936

District Attorney, Siskiyou County  
Post Office Box 986  
Yreka, CA 96097

District Attorney, Solano County  
675 Texas Street, Ste 4500  
Fairfield, CA 94533

District Attorney, Sonoma County  
600 Administration Drive, Room 212J  
Santa Rosa, CA 95403

District Attorney, Stanislaus County  
832 12<sup>th</sup> Street, Ste 300  
Modesto, CA 95353

District Attorney, Sutter County  
446 Second Street  
Yuba City, CA 95991

District Attorney, Tehama County  
Post Office Box 519  
Red Bluff, CA 96080

District Attorney, Trinity County  
Post Office Box 310  
Weaverville, CA 96093

District Attorney, Tulare County  
221 S. Mooney Avenue, Room 224  
Visalia, CA 93291

District Attorney, Tuolumne County  
423 N. Washington Street  
Sonora, CA 95370

District Attorney, Ventura County  
800 South Victoria Avenue  
Ventura, CA 93009

District Attorney, Yolo County  
301 2<sup>nd</sup> Street  
Woodland, CA 95695

District Attorney, Yuba County  
215 Fifth Street  
Marysville, CA 95901

Los Angeles City Attorney's Office  
City Hall East  
200 N. Main Street, Rm 800  
Los Angeles, CA 90012

San Diego City Attorney's Office  
1200 3rd Avenue, Ste 1620  
San Diego, CA 92101

San Francisco City Attorney's Office  
City Hall, Room 234  
1 Drive Carlton B Goodlett Place  
San Francisco, CA 94102

San Jose City Attorney's Office  
200 East Santa Clara Street  
San Jose, CA 95113