

1 Michael Freund SBN 99687  
2 Ryan Hoffman SBN 283297  
3 Law Office of Michael Freund  
4 1919 Addison Street, Suite 105  
5 Berkeley, CA 94704  
6 Telephone: (510) 540-1992  
7 Facsimile: (510) 540-5543

8 Attorneys for Plaintiff Environmental Research Center

**ENDORSED  
FILED  
ALAMEDA COUNTY**

**JUL 05 2013**

**CLERK OF THE SUPERIOR COURT  
By Molly Kautz**

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

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

14 **Plaintiff,**

15 **v.**

16 **THE SYNERGY COMPANY OF UTAH, LLC;**  
17 **and DOES 1-100,**

18 **Defendants.**

Case No. **RG 13686687**

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

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

19  
20  
21 Plaintiff Environmental Research Center hereby alleges:

22 **I**

23 **INTRODUCTION**

24 1. Plaintiff Environmental Research Center (hereinafter "Plaintiff" or "ERC") brings this  
25 action as a private attorney general enforcer and in the public interest pursuant to Health & Safety  
26 Code section 25249.7, subdivision (d). This complaint seeks injunctive and declaratory relief and  
27 civil penalties to remedy Defendant The Synergy Company of Utah, LLC's and Does 1-100  
28 (hereinafter "Synergy") failure to warn consumers that they have been exposed to lead from several

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

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8 **II**  
9 **PARTIES**

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

14 3. Defendant Synergy is a business that manufactures, distributes and/or sells nutritional  
15 health products that have exposed users to lead in the State of California within the relevant statute  
16 of limitations period. These Covered Products are The Synergy Company Vita Synergy for Men;  
17 The Synergy Company Vita Synergy for Women; and The Synergy Company Pure Synergy.  
18 Synergy is a company subject to Proposition 65 as it employs ten or more persons.

19 4. Defendants Does 1-100, are named herein under fictitious names, as their true names and  
20 capacities are unknown to ERC. ERC is informed and believes, and thereon alleges, that each of  
21 said Does is responsible, in some actionable manner, for the events and happenings hereinafter  
22 referred to, either through said Defendant's conduct, or through the conduct of its agents, servants or  
23 employees, or in some other manner, causing the harms alleged by ERC in this complaint. When  
24 said true names and capacities of Does are ascertained, ERC will seek leave to amend this complaint  
25 to set forth the same.

26 **III**  
27 **JURISDICTION AND VENUE**

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

1 6. The Complaint is based on allegations contained in a Notice of Violation dated June 1,  
2 2011, served on the California Attorney General, other public enforcers and Synergy. A true and  
3 correct copy of the Notice of Violation is attached as Exhibit A. More than 60 days have passed  
4 since the Notice of Violation was mailed and no public enforcement entity has filed a complaint  
5 in this case.

6 7. This Court is the proper venue for the action because the causes of action have arisen in  
7 the County of Alameda where some of the violations of law have occurred. Furthermore, this Court  
8 is the proper venue under Code of Civil Procedure section 395.5 and Health & Safety Code section  
9 25249.7.

#### 10 IV

### 11 STATUTORY BACKGROUND

#### 12 A. Proposition 65

13 8. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute  
14 passed as "Proposition 65" by an overwhelming majority vote of the people in November of 1986.

15 9. The warning requirement of Proposition 65 is contained in Health & Safety Code section  
16 25249.6, which provides:

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

20 10. Implementing regulations for Proposition 65 define expose as "to cause to ingest,  
21 inhale, contact via body surfaces or otherwise come into contact with a listed chemical." An  
22 individual may come into contact with a listed chemical through water, air, food, consumer products  
23 and any other environmental exposure as well as occupational exposures." (Cal. Code Regs., tit. 27,  
24 § 25102, subd. (i).)

25 11. In this case, the exposures at issue are caused by consumer products. Implementing  
26 regulations for Proposition 65 define a consumer product exposure as "an exposure which results  
27 from a person's acquisition, purchase, storage, consumption, or other reasonably foreseeable use of  
28 a consumer good, or any exposure that results from receiving a consumer service." (Cal. Code

1 Regs., tit. 27, § 25602, subd. (b).)

2 12. Whenever a clear and reasonable warning is required under Health & Safety Code  
3 section 25249.6, the "method employed to transmit the warning must be reasonably calculated  
4 considering the alternative methods available under the circumstances, to make the warning  
5 message available prior to exposure." (Cal. Code Regs., tit. 27, § 25601.) The warning requirement  
6 may be satisfied by a warning that appears on a product's label or other labeling, shelf labeling,  
7 signs, a system of signs, public advertising identifying the system and toll-free information services,  
8 or any other, system, that provides clear and reasonable warnings. (Cal. Code Regs., tit. 27, §  
9 25603.1, subd. (a)-(d).)

10 13. Proposition 65 establishes a procedure by which the State is to develop a list of  
11 chemicals "known to the State to cause cancer or reproductive toxicity." (Health & Safety Code,  
12 § 25249.8.) There is no duty to provide a clear and reasonable warning until 12-months after the  
13 chemical was published on the State list. (Health & Safety Code, § 25249.10, subd. (b).) Lead  
14 was listed as a chemical known to the State of California to cause developmental toxicity in the  
15 fetus and male and female reproductive toxicity on February 27, 1987. Lead was listed as a  
16 chemical known to the State of California to cause cancer on October 1, 1992. (Cal. Code Regs., tit.  
17 27, § 27001.)

18 14. The Maximum Allowable Dose Level for lead as a chemical known to cause  
19 developmental toxicity is 0.5 micrograms per day. (Cal. Code Regs., tit. 27, § 25805.) The No  
20 Significant Risk Level for lead as a carcinogen is 15 micrograms per day. (Cal. Code Regs., tit.  
21 27, § 25705.)

22 15. Proposition 65 may be enforced by any person in the public interest who provides  
23 notice sixty days before filing suit to both the violator and designated law enforcement officials.  
24 The failure of law enforcement officials to file a timely complaint enables a citizen suit to be filed  
25 pursuant to Health & Safety Code section 25249.7, subdivisions (c) and (d).

26 16. Proposition 65 provides that any person "violating or threatening to violate" Proposition  
27 65 may be enjoined in any court of competent jurisdiction. (Health & Safety Code, § 25249.7,  
28 subd. (a).) To "threaten to violate" means "to create a condition in which there is a substantial

1 probability that a violation will occur.” (Health & Safety Code, § 25249.11, subd. (e).)  
2 Furthermore, violators are subject to a civil penalty of up to \$2,500 per day for each violation.  
3 (Health & Safety Code, § 25249.7, subd. (b)(1).)

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5 V

6 **STATEMENT OF FACTS**

7 17. Synergy has manufactured, distributed and/or sold the Covered Products containing  
8 lead to the State of California. Consumers have been ingesting these products for many years,  
9 without any knowledge of their exposure to lead, a very dangerous chemical.

10 18. For many years, Synergy has knowingly and intentionally exposed numerous persons to  
11 lead, without providing a Proposition 65 warning. Prior to ERC’s Notice of Violation, Synergy  
12 failed to provide a warning on the label of the Covered Products. Synergy’s website does not  
13 contain any warning regarding lead contained in the Covered Products. Synergy has at all times  
14 relevant hereto been aware that the Covered Products contained lead and that persons using these  
15 products have been exposed to the chemical. Synergy’s website represents to the public that the  
16 company provides highly researched and tested formulas with an uncompromised set of complete  
17 quality standards and care as well as pure products to make a difference to the health and well-being  
18 of its customers. Synergy has been aware of the lead in the Covered Products and has failed to  
19 disclose the presence of this chemical to the public, who undoubtedly believed they have been  
20 ingesting totally healthy and pure products. Subsequent to ERC’s Notice of Violation, ERC has  
21 provided Synergy with test results from a reputable laboratory that demonstrates that the lead levels  
22 in the Covered Products exceed 0.5 micrograms per day.

23 19. Both prior and subsequent to ERC’s Notice of Violation, Synergy failed to provide  
24 consumers of the Covered Products with a clear and reasonable warning that they have been  
25 exposed to a chemical known to the State of California to cause cancer, birth defects and other  
26 reproductive harm.

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**FIRST CAUSE OF ACTION**

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

20. ERC refers to paragraphs 1-19, inclusive, and incorporates them herein by this reference.

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

22. Said violations render Synergy liable for civil penalties up to \$2,500 per day, for each violation.

**SECOND CAUSE OF ACTION**

**(Declaratory Relief)**

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

24. There exists an actual controversy relating to the legal rights and duties of the parties, within the meaning of Code of Civil Procedure section 1060, between ERC and SYNERGY concerning whether Synergy has exposed individuals to a chemical known to the State of California to cause cancer, birth defects and other reproductive harm without providing clear and reasonable warning.

**VI**

**PRAYER**

WHEREFORE ERC prays for relief as follows:

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

2. On the First Cause of Action, and pursuant to Health & Safety Code section 25249.7, subdivision (a), for such temporary restraining orders, preliminary and permanent injunctive orders.



## Environmental Research Center

5694 Mission Center Road #199

San Diego, CA 92108

619.309.4194

June 1, 2011

### VIA CERTIFIED MAIL

Current CEO or President  
The Synergy Company of Utah, LLC  
2279 Resource Blvd  
Moab, UT 84532

Mitchell M. May  
(The Synergy Company of Utah, LLC's  
Registered Agent for Service of Process)  
2279 Resource Blvd  
Moab, UT 84532

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:

**The Synergy Company of Utah, LLC**

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

- The Synergy Company Vita Synergy for Men - Lead**
- The Synergy Company Vita Synergy for Women - Lead**
- The Synergy Company Pure Synergy - 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 The Synergy Company of Utah, LLC and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This Notice covers all violations of Proposition 65 involving The Synergy Company of Utah, LLC 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.

The Synergy Company of Utah, LLC 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. The time period of these violations commenced one year after the listed dates set forth above and are ongoing. 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. The Synergy Company of Utah, LLC 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 The Synergy Company of Utah, LLC 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.

I am the contact person at ERC in this case, and although you may contact me directly at the above address and phone number, 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](mailto: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 The Synergy Company of Utah, LLC and its Registered Agent for Service only)
- Additional Supporting Information for Certificate of Merit (to AG only)

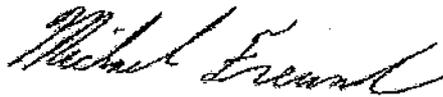
**CERTIFICATE OF MERIT**

**Re: Environmental Research Center's Notice of Proposition 65 Violations by The Synergy Company of Utah, LLC**

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: June 1, 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 June 1, 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  
The Synergy Company of Utah, LLC  
2279 Resource Blvd  
Moab, UT 84532

Mitchell M. May  
(The Synergy Company of Utah, LLC's  
Registered Agent for Service of Process)  
2279 Resource Blvd  
Moab, UT 84532

On June 1, 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 June 1, 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 June 1, 2011, in Fort Oglethorpe, Georgia.



Chris Heptinstall

Service List

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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.*  
June 1, 2011  
Page 7

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