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11 Attorneys for Plaintiff,
MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF SAN FRANCISCO
15 (Unlimited Jurisdiction)

16 MATEEL ENVIRONMENTAL
JUSTICE FOUNDATION,
17
18 Plaintiff,
19 v.
20 WHOLE FOODS MARKET, INC. and
WHOLE FOODS MARKET CALIFORNIA,
21 INC.
22 Defendants.

CASE NO. **CGC-12-520998**

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

TOXIC TORT/ENVIRONMENTAL

23
24
25 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

26 INTRODUCTION

27 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
28 failure of defendants WHOLE FOODS MARKET, INC. and WHOLE FOODS MARKET

ENDORSED
FILED
Superior Court of California
County of San Francisco
MAY 22 2012
CLERK OF THE COURT
BY: RODRIGO DELA VEGA
Deputy Clerk

1 residents of California, who handle, use, and consume food stored in or served from bulk
2 storage bins that have valves, nozzles, faucets, spigots and/or stopcocks made from lead-
3 containing alloys (hereinafter referred to as “Leaded Food Dispensers”), that handling, using and
4 consuming products dispensed from these Leaded Food Dispensers causes those residents to be
5 exposed to lead and lead compounds, lead acetate, lead phosphate, and lead subacetate
6 (hereinafter, collectively, “lead”). California residents ingest or otherwise come into contact with
7 tamari (soy sauce), vinegar, honey, maple syrup and kombucha served from Defendants’ Leaded
8 Food Dispensers. These foods become contaminated with lead when they pass through
9 processing and/or dispensing equipment which contains leaded parts. Lead from the parts of this
10 equipment leaches out of those parts into the food. People buy these foods in bulk. The types of
11 products to which this Complaint pertains are those types listed in the Proposition 65 Notice of
12 Violation Letter that is attached to and incorporated by reference into this Complaint. Lead is
13 known to the State of California to cause cancer, birth defects and male and female reproductive
14 toxicity.

15 2. Defendants market, and/or distribute foods or liquids from these Leaded Food
16 Dispensers. Defendants intend that residents of California handle, use and consume liquids
17 stored in, contained in or served from the Leaded Food Dispensers that Defendants market,
18 and/or distribute. When these products are handled and used in their normally intended manner
19 and when people consume the food or liquids that have been stored in or served from these
20 Leaded Food Dispensers, the Leaded Food Dispensers expose people to lead. In spite of knowing
21 that residents of California were and are being exposed to this toxic heavy metal when they
22 handle, use and consume food or liquids contained in or served from Leaded Food Dispensers,
23 Defendants did not and do not provide clear and reasonable warnings that these products cause
24 exposure to chemicals known to cause cancer, birth defects and other reproductive harm.

25 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7
26 to compel Defendants to bring their business practices into compliance with section 25249.5 et
27 seq. by providing a clear and reasonable warning to each individual who has been and who in the
28 future may be exposed to lead from the use of Defendants’ products. Plaintiff seeks an order that

1 defendants identify and locate each individual person who in the past has purchased food or
2 beverages served out of or from these Leaded Food Dispensers and to provide to each such
3 purchaser a clear and reasonable warning that the Leaded Food Dispensers will cause exposures
4 to chemicals known to cause birth defects.

5 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure
6 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known
7 to cause cancer, birth defects and other reproductive harm.

8 PARTIES

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

18 6. Defendants are persons doing business within the meaning of Health & Safety
19 Code Section 25249.11. Defendants are businesses that distribute, and/or market foods or liquids
20 from Leaded Food Dispensers in California, including the City and County of San Francisco.
21 Distribution and/or marketing of these products in the City and County of San Francisco and/or
22 to people who live in San Francisco, causes people to be exposed to lead and lead compounds
23 while they are physically present in the City and County of San Francisco.

24 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &
25 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of the
26 Notice of Violation dated, January 4, 2012, which Mateel sent to California's Attorney General.
27 A substantively identical letter was sent to every District Attorney in the state, and to the City
28 Attorneys of every California city with a population greater than 750,000, and to each defendant.

1 Attached to the Notice of Violation sent to each defendant was a summary of Proposition 65 that
2 was prepared by California's Office of Environmental Health Hazard Assessment. In addition,
3 each Notice of Violation plaintiff sent was accompanied by a Certificate of Service attesting to
4 the service of the Notice of Violation on each entity which received it. Pursuant to California
5 Health & Safety Code Section 25249.7(d), a Certificate of Merit attesting to the reasonable and
6 meritorious basis for the action was also sent with each Notice of Violation. Factual information
7 sufficient to establish the basis of the Certificates of Merit was enclosed the Notice of Violation
8 letter Mateel sent to the Attorney General.

9 8. Each defendant employs more than ten people.

10 JURISDICTION

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

16 10. This Court also has jurisdiction over Defendants because they are businesses that
17 have sufficient minimum contacts in California and within the City and County of San Francisco.
18 Defendants intentionally availed themselves of the California and San Francisco County markets
19 for Leaded Food Dispensers. It is thus consistent with traditional notions of fair play and
20 substantial justice for the San Francisco Superior Court to exercise jurisdiction over Defendants.

21 11. Venue is proper in this Court because Defendants market their Leaded Food
22 Dispensers around San Francisco and thus cause people to be exposed to lead and lead
23 compounds while those people are physically present in San Francisco. Liability for Plaintiff's
24 causes of action, or some parts thereof, has accordingly arisen in San Francisco during the times
25 relevant to this Complaint and Plaintiff seeks civil penalties imposed by statute.

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27 /// /// /// ///
28

FIRST CAUSE OF ACTION
(Claim for Injunctive Relief)

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

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

14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates that businesses that knowingly and intentionally expose any individual to a chemical known to the State of California to cause cancer or birth defects must first provide a clear and reasonable warning to such individual prior to the exposure.

15. Since at least three years prior to the Notice of Violation Letter, Defendants have engaged in conduct that violates Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and intentionally exposing to lead, those California residents who handle, use or consume liquids or foods stored in or served from Leaded Food Dispensers. The normally intended use of Leaded Food Dispensers causes exposure to lead and lead compounds, which are chemicals known to the State of California to cause cancer, birth defects and other reproductive harm. Defendants have not provided clear and reasonable warnings, within the meaning of Health & Safety Code Sections 25249.6 and 25249.11.

16. At all times relevant to this action, Defendants knew that the liquids or foods from the Leaded Food Dispensers they distributed or marketed were causing exposures to lead and lead compounds. Defendants intended that residents of California handle, use and or consume liquids or foods stored in, contained in or served from Leaded Food Dispensers in such ways as would lead to significant exposures to these chemicals.

17. By the above described acts, Defendants have violated Cal. Health & Safety Code § 25249.6 and are therefore subject to an injunction ordering them to stop violating Proposition 65, to provide warnings to all present and future customers and to provide warnings to their past

1 customers who purchased Defendants' products without receiving a clear and reasonable
2 warning.

3
4 SECOND CAUSE OF ACTION
5 (Claim for Civil Penalties)

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

8 19. By the above described acts, Defendants are liable and should be liable pursuant
9 to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each
10 individual exposed without proper warning to lead and lead compounds from the handling, use
11 of, or the consumption of liquids or foods stored in, contained in or served from Defendants'
12 Leaded Food Dispensers.

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1 PRAYER FOR RELIEF

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

3 1. Pursuant to the First Cause of Action, that 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' distributing or marketing of foods or liquids from Leaded Food Dispensers;

10 3. That Defendants be ordered to identify and locate each individual who purchased
11 foods or liquids from Leaded Food Dispensers and provide a warning to each such person that
12 the foods or liquids from these Leaded Food Dispensers the person purchased will expose that
13 person to chemicals known to cause birth defects.

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

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

17 Dated: May 17, 2012

KLAMATH ENVIRONMENTAL LAW CENTER

18
19
20 By W. Verick
21 William Verick
22 Attorney for Plaintiff
23 Mateel Environmental Justice Foundation
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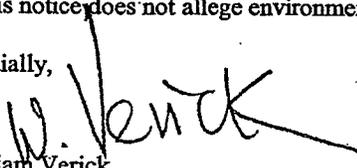
January 4, 2012

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 Whole Foods Market, Inc. and Whole Foods Market California, Inc. have been, are 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 ingest or otherwise come into contact with tamari (soy sauce), vinegar, honey, maple syrup and kombucha. These foods are contaminated with lead, a chemical known to cause birth defects and other reproductive harm. These foods become contaminated with lead when they pass through processing and/or dispensing equipment which contains leaded parts. Lead from the parts of this equipment leaches out of those parts into the food. People buy this food in bulk at Whole Foods Markets throughout California. They drink the kombucha. They use tamari and vinegar to season their food. They use honey and maple syrup to sweeten their food. They use vinegar to preserve food when they can the food or when they pickle food, and they also use vinegar when making poached eggs, and to clean and de-calcify objects in the household. They use honey and maple syrup in baking. When people ingest vinegar, tamari, honey, maple syrup and kombucha, they also ingest (and are therefore exposed to) lead. When people come into contact in other ways with these foods -- such as when touching them -- some of the lead dissolved in these foods is absorbed through the skin, and enters through cuts and abrasions in the skin. The routes of exposure to lead from these foods is, therefore, via the ingestion, dermal absorption, subcutaneous, and mucous membrane routes of exposure. This notice applies to all brands and all other forms of vinegar, tamari, honey, maple syrup and kombucha that Whole Foods Markets sell, to the extent they are sold in bulk. Whole Foods Markets, Inc. and Whole Foods Markets California, Inc. did not and does not provide people with clear and reasonable warnings before they expose California residents to lead. These violations have occurred every day since at least January 4, 2009, and will continue every day until the lead is removed from the brass beverage dispensers or until clear and reasonable warnings are given. These violations are alleged for occupational and consumer product exposures. We do not allege occupational exposure violations as to vinegar, tamari, honey, maple syrup or kombucha made outside of California, except as to Whole Foods Markets that are located in California. Workers at these markets are exposed in the same way as consumers are -- by ingesting these foods, or by touching them. This notice does not allege environmental exposure violations.

Cordially,

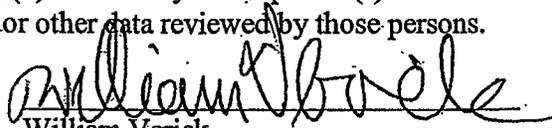

William Verick

424 First Street, Eureka, CA 95501 • 707.268.8900 (phone) 707.268.8901 (fax)

CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation 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: January 4, 2012


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 January 4, 2012, I caused the attached NOTICE OF VIOLATION 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 NOTICE OF VIOLATION 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 January 4, 2012, at Eureka, California.


Nicole Frank

SERVICE LIST

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

OAKLAND CITY ATTORNEY
CITY HALL 6TH FLOOR
1 FRANK OGAWA PLAZA
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

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF IMPERIAL
940 W. MAIN STREET, SUITE 102
EL CENTRO, CA 92243-2880

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
1355 WEST STREET
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 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

JOHN P MACKKEY, CEO
WHOLE FOODS MARKET, INC.
550 BOWIE STREET
AUSTIN, TX 78703

PRESIDENT OR CEO
WHOLE FOODS MARKET CALIFORNIA, INC.
550 BOWIE STREET
AUSTIN, TX 78703