

1 RICHARD DRURY (CBN 163559)
2 DOUGLAS CHERMAK (CBN 233382)
3 LOZEAU | DRURY LLP
4 410 12th Street, Suite 250
5 Oakland, CA 94607
6 Ph: 510-836-4200
7 Fax: 510-836-4205
8 Email: richard@lozeaudrury.com
9 Attorney for Plaintiff
10 ENVIRONMENTAL RESEARCH CENTER

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

11 ENVIRONMENTAL RESEARCH CENTER,) Case No. _____
12 a non-profit California corporation,)
13 Plaintiff,) **COMPLAINT FOR INJUNCTIVE**
14 v.) **RELIEF AND CIVIL PENALTIES**
15 AMERICAN BOTANICAL PHARMACY,) Health & Safety Code §25249.5, *et seq.*
16 INC., a California Corporation,)
17 Defendant.)

18
19 Plaintiff Environmental Research Center brings this action in the interests of the
20 general public and, on information and belief, hereby alleges:

21 **INTRODUCTION**

22 1. This action seeks to remedy the continuing failure of Defendant American
23 Botanical Pharmacy, Inc. to warn consumers in California that they are being exposed to lead,
24 a substance known to the State of California to cause cancer, birth defects, and other
25 reproductive harm. Defendant manufactures, packages, distributes, markets, and/or sells in
26 California certain products containing lead (the “PRODUCTS”):

- **American Botanical Pharmacy Dr. Schulze’s Intestinal Formula #1 Maximum Strength**
- **Dr. Schulze’s American Botanical Pharmacy Protect**
- **Dr. Schulze’s American Botanical Pharmacy SuperFood 100**
- **Dr. Schulze’s American Botanical Pharmacy 100% Organic HerbalMucil Plus**
- **Dr. Schulze’s American Botanical Pharmacy SuperFood Plus**
- **American Botanical Pharmacy Dr. Schulze’s Female “Shot”**
- **Dr. Schulze’s American Botanical Pharmacy 100% Herbal SuperSlim**
- **Dr. Schulze’s American Botanical Pharmacy Dr. Schulze’s Intestinal Formula # 2 Powder**

2. Lead (hereinafter, the “LISTED CHEMICAL”) is a substance known to the State¹ of California to cause cancer, birth defects, and other reproductive harm.

3. The use and/or handling of the PRODUCTS causes exposures to the LISTED CHEMICAL at levels requiring a “clear and reasonable warning” under California's Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”) §25249.5, *et seq.* (also known as "Proposition 65"). Defendant has failed to provide the health hazard warnings required by Proposition 65.

4. Defendant’s continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS without the required health hazard warnings, causes individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICAL that violate Proposition 65.

5. Plaintiff seeks injunctive relief enjoining Defendant from the continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in California without provision of clear and reasonable warnings regarding the risks of cancer, birth defects, and other reproductive harm posed by exposure to the LISTED CHEMICAL through the use and/or handling of the PRODUCTS. Plaintiff seeks an injunctive order

¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 compelling Defendant to bring its business practices into compliance with Proposition 65 by
2 providing a clear and reasonable warning to each individual who has been and who in the
3 future may be exposed to the LISTED CHEMICAL from the use of the PRODUCTS. Plaintiff
4 also seeks an order compelling Defendant to identify and locate each individual person who in
5 the past has purchased the PRODUCTS, and to provide to each such purchaser a clear and
6 reasonable warning that the use of the PRODUCTS will cause exposures to the LISTED
7 CHEMICAL.

8 6. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties in
9 excess of \$15 million to remedy Defendant's failure to provide clear and reasonable warnings
10 regarding exposures to the LISTED CHEMICAL.

11 **JURISDICTION AND VENUE**

12 7. This Court has jurisdiction over this action pursuant to California Constitution
13 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes
14 except those given by statute to other trial courts." The statute under which this action is
15 brought does not specify any other basis for jurisdiction.

16 8. This Court has jurisdiction over Defendant because, based on information and
17 belief, Defendant is a business having sufficient minimum contacts with California, or
18 otherwise intentionally availing itself of the California market through the distribution and sale
19 of the PRODUCTS in the State of California to render the exercise of jurisdiction over it by the
20 California courts consistent with traditional notions of fair play and substantial justice.

21 9. Venue in this action is proper in the Alameda Superior Court because the
22 Defendant has violated California law in the County of Alameda.

23 **PARTIES**

24 10. PLAINTIFF Environmental Research Center ("PLAINTIFF" or "ERC") is a
25 non-profit corporation organized under California's Corporation Law. ERC is dedicated to,
26

1 among other causes, reducing the use and misuse of hazardous and toxic substances, consumer
2 protection, worker safety, and corporate responsibility.

3 11. ERC is a person within the meaning of H&S Code §25118 and brings this
4 enforcement action in the public interest pursuant to H&S Code §25249.7(d).

5 12. Defendant AMERICAN BOTANICAL PHARMACY, INC.
6 (“DEFENDANT” or “ABP”) is a corporation organized under California’s Corporation
7 Law and is a person doing business within the meaning of H&S Code §25249.11.

8 13. DEFENDANT manufactures, packages, distributes, markets and/or sells the
9 PRODUCTS for sale or use in California and in Alameda County.

10 **STATUTORY BACKGROUND**

11 14. The People of the State of California have declared in Proposition 65 their right
12 “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
13 reproductive harm.” (Section 1(b) of Initiative Measure, Proposition 65).

14 15. To effect this goal, Proposition 65 requires that individuals be provided with a
15 “clear and reasonable warning” before being exposed to substances listed by the State of
16 California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent
17 part:

18 No person in the course of doing business shall knowingly and intentionally
19 expose any individual to a chemical known to the state to cause cancer or
20 reproductive toxicity without first giving clear and reasonable warning to such
21 individual....

22 16. Proposition 65 provides that any person “violating or threatening to violate” the
23 statute may be enjoined in a court of competent jurisdiction. (H&S Code §25249.7). The phrase
24 “threatening to violate” is defined to mean creating “a condition in which there is a substantial
25 likelihood that a violation will occur.” (H&S Code §25249.11(e)). Violators are liable for civil
26 penalties of up to \$2,500 per day for each violation of the Act. (H&S Code §25249.7.)

FACTUAL BACKGROUND

17. On February 27, 1987, the State of California officially listed the chemical lead

1 as a chemical known to cause reproductive toxicity. Lead became subject to the warning
2 requirement one year later and was therefore subject to the "clear and reasonable" warning
3 requirements of Proposition 65 beginning on February 27, 1988. (27 California Code of
4 Regulations ("CCR") §25000, *et seq.*; H&S Code §25249.5, *et seq.*).

5 18. On October 1, 1992, the State of California officially listed the chemicals lead
6 and lead compounds as chemicals known to cause cancer. Lead and lead compounds became
7 subject to the warning requirement one year later and were therefore subject to the "clear and
8 reasonable" warning requirements of Proposition 65 beginning on October 1, 1993. (27 CCR
9 § 25000, *et seq.*; H&S Code §25249.6, *et seq.*). Due to the high toxicity of lead, the maximum
10 allowable dose level for lead is 0.5 ug/day (micrograms a day) for reproductive toxicity.

11 19. To test Defendant's PRODUCTS for lead, PLAINTIFF hired a well-respected
12 and accredited testing laboratory that designed the testing protocol used and approved by the
13 California Attorney General years ago for testing heavy metals. The results of testing
14 undertaken by PLAINTIFF of DEFENDANT's PRODUCTS show that the PRODUCTS tested
15 were in violation of the 0.5 ug/day "safe harbor" daily dose limit set forth in Proposition 65's
16 regulations. Very significant is the fact that people are being exposed to lead through ingestion
17 as opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of
18 lead produces much higher exposure levels and health risks than does dermal exposure to this
19 chemical.

20 20. At all times relevant to this action, DEFENDANT, therefore, has knowingly and
21 intentionally exposed the users and/or handlers of the PRODUCTS to the LISTED
22 CHEMICAL without first giving a clear and reasonable warning to such individuals.

23 21. The PRODUCTS have allegedly been sold by DEFENDANT for use in
24 California since at least September 17, 2009. The PRODUCTS continue to be distributed
25 and sold in California without the requisite warning information.

26 22. On September 17, 2012, ERC served DEFENDANT and each of the appropriate

1 the violations, including the chemicals involved, the routes of toxic exposure, and the specific
2 product or type of product causing the violations, and was issued as follows:

- 3 a. DEFENDANT and the California Attorney General were provided copies
4 of the Notice by Certified Mail.
- 5 b. DEFENDANT was provided a copy of a document entitled "The Safe
6 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
7 Summary," which is also known as Appendix A to Title 27 of CCR
8 §25903.
- 9 c. The California Attorney General was provided with a Certificate of Merit
10 by the attorney for the noticing party, stating that there is a reasonable
11 and meritorious case for this action, and attaching factual information
12 sufficient to establish a basis for the certificate, including the identity of
13 the persons consulted with and relied on by the certifier, and the facts,
14 studies, or other data reviewed by those persons, pursuant to H&S Code
15 §25249.7(h) (2).

16 27. The appropriate public enforcement agencies have failed to commence and
17 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against DEFENDANT
18 based on the allegations herein.

19 28. By committing the acts alleged in this Complaint DEFENDANT at all times
20 relevant to this action, and continuing through the present, has violated H&S Code §25249.6 by,
21 in the course of doing business, knowingly and intentionally exposing individuals who use or
22 handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first
23 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6
24 and 25249.11(f).

25 29. By the above-described acts, DEFENDANT has violated H&S Code § 25249.6
26 and is therefore subject to an injunction ordering DEFENDANT to stop violating Proposition
65, to provide warnings to all present and future customers, and to provide warnings to

1 DEFENDANT’S past customers who purchased or used the PRODUCTS without receiving a
2 clear and reasonable warning.

3 30. An action for injunctive relief under Proposition 65 is specifically authorized by
4 Health & Safety Code §25249.7(a).

5 31. Continuing commission by DEFENDANT of the acts alleged above will
6 irreparably harm the citizens of the State of California, for which harm they have no plain,
7 speedy, or adequate remedy at law.

8 Wherefore, PLAINTIFF prays judgment against DEFENDANT, as set forth hereafter.

9
10 **SECOND CAUSE OF ACTION**
11 **(Civil Penalties for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the**
12 **PRODUCTS described in PLAINTIFF’s NOTICE)**
13 **Against DEFENDANT**

14 32. PLAINTIFF realleges and incorporates by reference Paragraphs 1 through 31,
15 inclusive, as if specifically set forth herein.

16 33. By committing the acts alleged in this Complaint, DEFENDANT at all times
17 relevant to this action, and continuing through the present, has violated H&S Code §25249.6 by,
18 in the course of doing business, knowingly and intentionally exposing individuals who use or
19 handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first
20 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6
21 and 25249.11(f).

22 34. By the above-described acts, DEFENDANT is liable, pursuant to H&S Code
23 §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to the
24 LISTED CHEMICAL from the PRODUCTS, in an amount in excess of \$15 million.

25 Wherefore, PLAINTIFF prays judgment against DEFENDANT, as set forth hereafter.

26 **THE NEED FOR INJUNCTIVE RELIEF**

35. PLAINTIFF realleges and incorporates by this reference Paragraphs 1 through

1 34, as if set forth below.

2 36. By committing the acts alleged in this Complaint, DEFENDANT has caused
3 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence
4 of equitable relief, DEFENDANT will continue to create a substantial risk of irreparable injury
5 by continuing to cause consumers to be involuntarily and unwittingly exposed to the LISTED
6 CHEMICAL through the use and/or handling of the PRODUCTS.

7 **PRAYER FOR RELIEF**

8 Wherefore, PLAINTIFF accordingly prays for the following relief:

9 A. a preliminary and permanent injunction, pursuant to H&S Code §25249.7(b),
10 enjoining DEFENDANT, its agents, employees, assigns and all persons acting in concert or
11 participating with DEFENDANT, from distributing or selling the PRODUCTS in California
12 without first providing a clear and reasonable warning, within the meaning of Proposition 65,
13 that the users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICAL.

14 B. an injunctive order, pursuant to H&S Code §25249.7(b), compelling
15 DEFENDANT to identify and locate each individual who has purchased the PRODUCTS since
16 September 17, 2009, and to provide a warning to such person that the use of the PRODUCTS
17 will expose the user to chemicals known to cause cancer, birth defects, and other reproductive
18 harm.

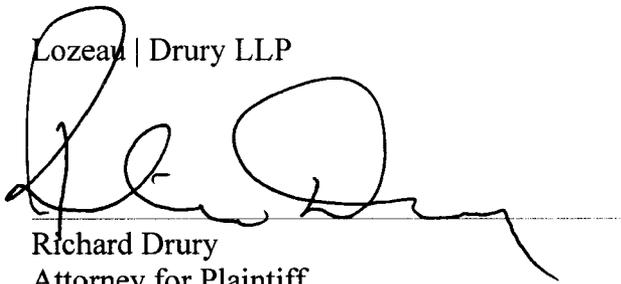
19 C. an assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
20 against DEFENDANT in the amount of \$2,500 per day for each violation of Proposition 65, in
21 an amount in excess of \$15 million;

22 D. an award to PLAINTIFF of its reasonable attorney's fees and costs of suit
23 pursuant to California Code of Civil Procedure §1021.5, as PLAINTIFF shall specify in further
24 application to the Court; and,

25 E. such other and further relief as may be just and proper.
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1 DATED: January 24, 2014

Lozeau | Drury LLP

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4 Richard Drury
5 Attorney for Plaintiff
6 Environmental Research Center
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Exhibit A

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T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

VIA CERTIFIED MAIL

Current CEO or President
American Botanical Pharmacy
P.O. Box 9849
Marina Del Rey, CA 90295

Current CEO or President
Dr. Schulze's American Botanical Pharmacy
P.O. Box 9699
Marina Del Rey, CA 90295

Current CEO or President
American Botanical Pharmacy
P.O. Box 9699
Marina Del Rey, CA 90295

Current CEO or President
Dr. Schulze's American Botanical Pharmacy
4114 Glencoe Ave.
Marina Del Rey, CA 90295

Kirt Sechooler
(American Botanical Pharmacy's
Registered Agent for Service of Process)
21243 Ventura Boulevard, Suite 227
Woodland Hills, CA 91364

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 represent 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.

The names of the Companies covered by this notice that violated Proposition 65 (hereinafter “the Violators”) are:

**American Botanical Pharmacy
Dr. Schulze’s American Botanical Pharmacy**

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

**American Botanical Pharmacy Dr. Schulze’s Intestinal Formula #1
Maximum Strength - Lead**

Dr. Schulze’s American Botanical Pharmacy Protect - Lead

Dr. Schulze’s American Botanical Pharmacy SuperFood 100 - Lead

**Dr. Schulze’s American Botanical Pharmacy 100% Organic HerbalMucil
Plus - Lead**

Dr. Schulze’s American Botanical Pharmacy SuperFood Plus - Lead

American Botanical Pharmacy Dr. Schulze’s Female “Shot” - Lead

Dr. Schulze’s American Botanical Pharmacy 100% Herbal SuperSlim - Lead

**Dr. Schulze’s American Botanical Pharmacy Dr. Schulze’s Intestinal
Formula # 2 Powder - 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 and lead compounds as chemicals known to cause cancer.

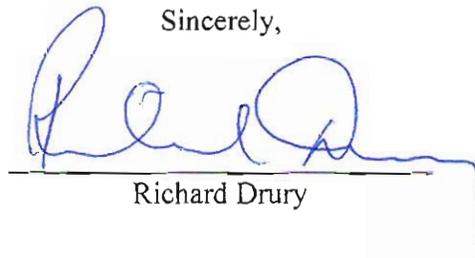
This letter is a notice to the Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators currently known to ERC from the information now available. ERC may continue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

The Violators have 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 consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. 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. The Violators violated Proposition 65 because they failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to the identified chemicals. Each of these ongoing violations has occurred on every day since September 17, 2009, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

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 Violators agree 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 my client'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.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,



Richard Drury

Attachments

Certificate of Merit

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

September 17, 2012

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Certificate of Service

OEHHA Summary (to American Botanical Pharmacy and its Registered Agent for
Service of Process only and to Dr. Schulze's American Botanical Pharmacy)

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

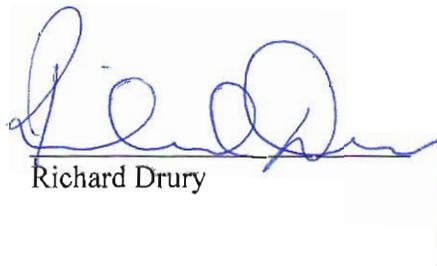
CERTIFICATE OF MERIT

**Re: Environmental Research Center's Notice of Proposition 65 Violations by
American Botanical Pharmacy and Dr. Schulze's American Botanical
Pharmacy**

I, Richard Drury, 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 violators 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: September 17, 2012


Richard Drury

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. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On September 17, 2012, 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 with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President
American Botanical Pharmacy
P.O. Box 9849
Marina Del Rey, CA 90295

Kirt Sechooler
(American Botanical Pharmacy’s
Registered Agent for Service of Process)
21243 Ventura Boulevard, Suite 227
Woodland Hills, CA 91364

Current CEO or President
Dr. Schulze’s American Botanical Pharmacy
P.O. Box 9699
Marina Del Rey, CA 90295

Current CEO or President
Dr. Schulze’s American Botanical Pharmacy
4114 Glencoe Ave.
Marina Del Rey, CA 90295

Current CEO or President
American Botanical Pharmacy
P.O. Box 9699
Marina Del Rey, CA 90295

On September 17, 2012, 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 with the postage fully prepaid 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

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

September 17, 2012

Page 7

On September 17, 2012, 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 with the postage fully prepaid for delivery by Priority Mail.

Executed on September 17, 2012, in Fort Oglethorpe, Georgia.



Amber Schaub

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

September 17, 2012

Page 8

Service List

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009
District Attorney, Amador County 708 Court Street, Suite 202 Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202	District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive, Suite 245 Orville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012
District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932	District Attorney, Merced County 550 W. Main Street Merced, CA 95340	District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101
District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102
District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517	District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113
District Attorney, El Dorado County 515 Main Street Placerville, CA 95667	District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902	District Attorney, Shasta County 1355 West Street Redding, CA 96001	
District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 110 Union Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	