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**ENDORSED  
FILED  
ALAMEDA COUNTY**

APR 11 2013

CLERK OF THE SUPERIOR COURT  
BY **MARGARET L. DOWNIE** Deputy

8 Attorney for Plaintiff Environmental Research Center

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

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

Case No. **RG13674997**

13 **Plaintiff,**

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

14 **v.**

15 **GLOBAL HEALING CENTER, INC., GHC**  
16 **ND OPERATIONS, LLC and 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 **I**

22 **INTRODUCTION**

23  
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 (d). This complaint seeks injunctive and declaratory relief and civil penalties  
27 to remedy Defendants, Global Healing Center, Inc. and GHC ND Operations, LLC's (hereinafter  
28

1 "Global Healing Center") failure to warn consumers that they have been exposed to lead from  
2 several of the company's nutritional health products. Lead is a chemical known to the State of  
3 California to cause cancer, birth defects and other reproductive harm. Based on the Safe Drinking  
4 Water and Toxic Enforcement Act of 1986 (Health & Safety Code Section 25249.5 *et seq.*) also  
5 known as "Proposition 65," businesses with ten or more employees must provide a "clear and  
6 reasonable warning" prior to exposing persons to these chemicals.  
7

## 8 II

### 9 PARTIES

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

15 3. Defendant Global Healing Center is a business that manufactures, distributes and/or sells  
16 nutritional health products that have exposed users to lead in the State of California within the  
17 relevant statute of limitations period. These Covered Products include GHC ND Operations Ltd.  
18 Global Healing Center ParaTrex; Premier Research Labs Premier Greens Caps Super Greens  
19 Formula; Sunwarrior Ormus SuperGreens; and Sunwarrior Protein Raw Vegan Vanilla. Global  
20 Healing Center is a company subject to Proposition 65 as it employs ten or more persons.  
21

22 4. Defendants Does I-100, are named herein under fictitious names, as their true names and  
23 capacities are unknown to Plaintiff. ERC is informed and believes, and thereon alleges, that each of  
24 said Does is responsible, in some actionable manner, for the events and happenings hereinafter  
25 referred to, either through said Defendants' conduct, or through the conduct of its agents, servants or  
26 employees, or in some other manner, causing the harms alleged by ERC in this complaint. When  
27  
28

1 said true names and capacities of Does are ascertained, ERC will seek leave to amend this complaint  
2 to set forth the same.  
3

### 4 III

#### 5 JURISDICTION AND VENUE

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

9 6. The Complaint is based on allegations contained in a Notice of Violation dated October 26,  
10 2012, served on the California Attorney General, other public enforcers and Global Healing  
11 Center. A true and correct copy of the Notice of Violation is attached hereto as Exhibit A. More  
12 than 60 days have passed since the Notice of Violation was mailed and no public enforcement  
13 entity has filed a complaint in this case.

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

### 19 IV

#### 20 STATUTORY BACKGROUND

##### 21 A. Proposition 65

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

25 9. The warning requirement of Proposition 65 is contained in Health & Safety Code Section  
26 25249.6, which provides:

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

1  
2 10. Implementing regulations for Proposition 65 provide that warnings are required for consumer  
3 product exposures. A "consumer product exposure is an exposure which results from a person's  
4 acquisition, purchase, storage, consumption, or other reasonably foreseeable use of a consumer good,  
5 or any exposure that results from receiving a consumer service." 27 CCR Section 25601 (b).

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

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

21  
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 pursuant to Health & Safety Code Section 25249.7 (c) and (d).

26  
27 14. Proposition 65 provides that any person "violating or threatening to violate" Proposition 65  
28 may be enjoined in any court of competent jurisdiction. Health & Safety Code Section 25249.7 (a).

1 To "threaten to violate" means "to create a condition in which there is a substantial probability that a  
2 violation will occur." Id., Section 25249.11 (e). Furthermore, violators are subject to a civil penalty  
3 of up to \$2,500 per day for each violation. Id., Section 25249.7 (b).  
4

5 V

6 **STATEMENT OF FACTS**

7 15. Global Healing Center has manufactured, distributed and/or sold the Covered Products  
8 containing lead to the State of California. Consumers have been ingesting these products for  
9 many years, without any knowledge of their exposure to lead, a very dangerous chemical.  
10

11 16. For many years, Global Healing Center has knowingly and intentionally exposed numerous  
12 persons to lead, without providing a Proposition 65 warning. Prior to ERC's Notice of Violation,  
13 Global Healing Center failed to provide a warning on the label of the Covered Products, nor was  
14 there any mention on the company's website that the products contained lead. Global Healing  
15 Center has at all times relevant hereto been aware that the Covered Products contained lead and that  
16 persons using these products have been exposed to the chemical. Global Healing Center's website  
17 represents to the public that the company "is the premier source for organic living and natural health.  
18 We offer a wide variety of high quality, green living lifestyle products to help you maintain a clean  
19 body and live a healthy lifestyle." Global Healing Center has been aware that lead is present in the  
20 Covered Products and has failed to disclose the existence of this chemical to the public, who  
21 undoubtedly believed they have been ingesting totally healthy and pure products.  
22

23 17. Both prior and subsequent to ERC's Notice of Violation, Global Healing Center failed to  
24 provide 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)**

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

19. By committing the acts alleged above, Global Healing Center 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.

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

**SECOND CAUSE OF ACTION**

**(Declaratory Relief)**

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

22. 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 Global Healing Center concerning:

a) whether Global Healing Center 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;

1  
2 2. On the First Cause of Action, and pursuant to Health & Safety Code Section 25249.7 (a), for  
3 such temporary restraining orders, preliminary and permanent injunctive orders, or other orders,  
4 prohibiting Global Healing Center from exposing persons to lead without providing clear and  
5 reasonable warning;

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

8 a. that Global Healing Center has exposed individuals to a chemical known to the State of  
9 California to cause, birth defects and other reproductive harm without providing clear and reasonable  
10 warning; and

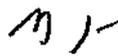
11 4. On all Causes of Action, for reasonable attorneys' fees pursuant to Section 1021.5 of the Code  
12 of Civil Procedure or the substantial benefit theory;

13 5. For costs of suit herein; and

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

15 Dated: April 7, 2013

16  
17  
18 By



19  
20 Michael Freund  
21 Attorney for Environmental Research Center  
22  
23  
24  
25  
26  
27  
28



**Environmental Research Center**

3111 Camino Del Rio North, Suite 400

San Diego, CA 92108

619-500-3090

October 26, 2012

**NOTICE OF VIOLATIONS OF  
CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.5 ET SEQ.  
(PROPOSITION 65)**

Dear Alleged Violators and the Appropriate Public Enforcement Agencies:

I am the Executive Director of the Environmental Research Center ("ERC"). 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.

ERC has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at California Health & Safety Code §25249.5 *et seq.*, with respect to the products identified below. These violations have occurred and continue to occur because the alleged Violators identified below failed to provide required clear and reasonable warnings with these products. This letter serves as a notice of these violations to the alleged Violators and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, ERC intends to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

**General Information about Proposition 65.** A copy of a summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is an attachment with the copy of this letter served to the alleged Violators identified below.

**Alleged Violators.** The names of the companies covered by this notice that violated Proposition 65 (hereinafter collectively referred to as "the Violators") are:

**Global Healing Center, Inc.  
GHC ND Operations, LLC**

**Consumer Products and Listed Chemicals.** The products that are the subject of this notice and the chemical in that product identified as exceeding allowable levels are:

**GHC ND Operations Ltd. Global Healing Center ParaTrex - Lead**

**Premier Research Labs Premier Greens Caps Super Greens Formula - Lead**

**Sunwarrior Ormus SuperGreens - Lead**

**Sunwarrior Protein Raw Vegan Vanilla - 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.

It should be noted that ERC may continue to investigate other products that may reveal further violations and result in subsequent notices of violations.

**Route of Exposure.** The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to these chemicals has been and continues to be through ingestion, but may have also occurred and may continue to occur through inhalation and/or dermal contact.

**Approximate Time Period of Violations.** Ongoing violations have occurred every day since at least October 26, 2009, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until these known toxic chemicals are either removed from or reduced to allowable levels in the products. 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 label. The Violators violated Proposition 65 because it failed to provide persons handling and/or using these products with appropriate warnings that they are being exposed to these chemicals.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, ERC is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violators to: (1) reformulate the identified products so as to eliminate further exposures to the identified chemicals, or provide appropriate warnings on the labels of these products; and (2) pay an appropriate civil penalty. Such a resolution will prevent further unwarned consumer exposures to the identified chemicals, as well as an expensive and time consuming litigation.

October 26, 2012

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Please direct all questions concerning this notice to ERC at the above listed address and telephone number.

Sincerely,



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Chris Heptinstall  
Executive Director  
Environmental Research Center

Attachments

- Certificate of Merit
- Certificate of Service
- OEHHA Summary (to Global Healing Center, Inc., GHC ND Operations, LLC and their Registered Agents for Service of Process only)
- Additional Supporting Information for Certificate of Merit (to AG only)

**Re: Environmental Research Center's Notice of Proposition 65 Violations by Global Healing Center, Inc. and GHC ND Operations, LLC**

**CERTIFICATE OF MERIT**  
**Health and Safety Code Section 25249.7(d)**

I, Chris Heptinstall, declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the parties identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am the Executive Director 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 chemicals that are 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. 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 persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.



Dated: October 26, 2012

\_\_\_\_\_  
Chris Heptinstall

**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 October 26, 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  
Global Healing Center, Inc.  
2040 North Loop West  
Suite 108  
Houston, TX 77018

Edward F. Group, III  
(Global Healing Center, Inc.'s Registered Agent  
for Service of Process)  
2040 North Loop West  
Suite 108  
Houston, TX 77018

Current CEO or President  
GHC ND Operations, LLC  
2040 North Loop West  
Suite 108  
Houston, TX 77018

Stacey L. Barnes  
(GHC ND Operations, LLC's Registered Agent  
for Service of Process)  
4309 Yoakum  
Suite 100  
Houston, TX 77006

On October 26, 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:

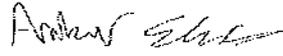
Office of the California Attorney General  
Prop 65 Enforcement Reporting  
1515 Clay Street, Suite 2000  
Post Office Box 70550  
Oakland, CA 94612-0550

On October 26, 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.

October 26, 2012

Page 6

Executed on October 26, 2012, in Fort Oglethorpe, Georgia.



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Amber Schaub

**Service List**

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

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

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

District Attorney, Butte County  
25 County Center Drive, Suite 245  
Oroville, CA 95965

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

District Attorney, Colusa County  
346 Fifth Street Suite 101  
Colusa, CA 95932

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

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

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

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

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

District Attorney, Humboldt County  
825 5th Street 4<sup>th</sup> Floor  
Eureka, CA 95501

District Attorney, Imperial County  
940 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, Suite 18000  
Los Angeles, CA 90012

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

District Attorney, Marin County  
3501 Civic Center Drive, 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  
550 W. Main 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  
Post Office Box 1131  
Salinas, CA 93902

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 West Civic Center Drive  
Santa Ana, CA 92701

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  
3960 Orange Street  
Riverside, CA 92501

District Attorney, Sacramento County  
901 "G" Street  
Sacramento, CA 95814

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, Suite 1300  
San Diego, CA 92101

District Attorney, San Francisco County  
850 Bryant Street, Suite 322  
San Francisco, CA 94103

District Attorney, San Joaquin County  
222 E. Weber Ave. Rm. 202  
Stockton, CA 95202

District Attorney, San Luis Obispo County  
1035 Palm St, 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  
1112 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  
1355 West Street  
Redding, CA 96001

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 95354

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 Blvd., Room 224  
Visalia, CA 93291

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

District Attorney, Ventura County  
800 South Victoria Ave, Suite 314  
Ventura, CA 93009

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

District Attorney, Yuba County  
215 Fifth Street, Suite 152  
Marysville, CA 95901

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

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

San Francisco, City Attorney  
City Hall, Room 234  
1 Dr Carlton B Goodlett PL  
San Francisco, CA 94102

San Jose City Attorney's Office  
200 East Santa Clara Street,  
16<sup>th</sup> Floor  
San Jose, CA 95113