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FILED
ALAMEDA COUNTY

NOV 25 2013

CLERK OF THE SUPERIOR COURT

By *[Signature]* Deputy

Attorneys for Plaintiff Environmental Research Center

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF ALAMEDA**

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

14 **Plaintiff,**

15 **vs.**

16 **INNERLIGHT HOLDINGS, INC and DOES**
17 **1-100**

18 **Defendants.**

CASE NO. **RG 13705001**

**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 Plaintiff Environmental Research Center hereby alleges:

21 **I**

22 **INTRODUCTION**

23 1. Plaintiff Environmental Research Center (hereinafter "Plaintiff" or "ERC") brings this
24 action as a private attorney general enforcer and in the public interest pursuant to Health & Safety
25 Code section 25249.7, subdivision (d). This complaint seeks injunctive and declaratory relief and
26 civil penalties to remedy Defendant Innerlight Holdings, Inc. and Does 1-100 (hereinafter
27 "Innerlight")'s failure to warn consumers that they have been exposed to lead from several of
28 Innerlight's nutritional health products. Lead is a chemical known to the State of California to

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

5 **II**

6 **PARTIES**

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

11 3. Defendant Innerlight is a business that manufactures, distributes and/or sells nutritional
12 health products that have exposed users to lead in the State of California within the relevant statute
13 of limitations period. These "Covered Products" are InnerLight Inc. 000117 Men's Formula,
14 InnerLight 000240 SuperGreens, InnerLight Inc. 000115 Women's Formula, InnerLight Inc.
15 000135 Paracide, InnerLight 000230 SuperGreens, InnerLight Worldwide Inc. Earth Essence
16 Montmorillonite Clay Powder, InnerLight 000130 Fibrada Plus, InnerLight Inc. 000113 Adrenal
17 Plus, InnerLight Inc. 000104 Spectrazyme, InnerLight 000089 Lymphatica A-Plus, InnerLight Inc.
18 000073 Orthoplex II, InnerLight Inc. Sagrada Plus, and InnerLight Inc. Lung Plus. Innerlight is a
19 company subject to Proposition 65 as it employs ten or more persons.

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

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III

JURISDICTION AND VENUE

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.

6. The Complaint is based on allegations contained in a Notice of Violation dated November 30, 2012, served on the California Attorney General, other public enforcers and Innerlight. A true and correct copy of the Notice of Violation is attached as Exhibit A. More than 60 days have passed since the Notice of Violation was mailed and no public enforcement entity has filed a complaint in this case.

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

IV

STATUTORY BACKGROUND

A. Proposition 65

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

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

No person in the course of doing business shall knowingly and intentionally expose any 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.

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

1 11. In this case, the exposures at issue are caused by consumer products. Implementing
2 regulations for Proposition 65 define a consumer product exposure as “ an exposure which results
3 from a person’s acquisition, purchase, storage, consumption, or other reasonably foreseeable use of
4 a consumer good, or any exposure that results from receiving a consumer service.” (Cal. Code
5 Regs., tit. 27, § 25602, subd. (b).)

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

14 13. Proposition 65 establishes a procedure by which the State is to develop a list of
15 chemicals “known to the State to cause cancer or reproductive toxicity.” (Health & Safety Code,
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. (Health & Safety Code, § 25249.10, subd. (b).) Lead
18 was listed as a chemical known to the State of California to cause developmental toxicity in the
19 fetus and male and female reproductive toxicity on February 27, 1987. Lead was listed as a
20 chemical known to the State of California to cause cancer on October 1, 1992. (Cal. Code Regs., tit.
21 27, § 27001.)

22 14. The Maximum Allowable Dose Level for lead as a chemical known to cause
23 reproductive toxicity is 0.5 micrograms per day. (Cal. Code Regs., tit. 27, § 25805.) The No
24 Significant Risk Level for lead as a carcinogen is 15 micrograms per day. (Cal. Code Regs., tit.
25 27, § 25705.)

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

1 pursuant to Health & Safety Code section 25249.7, subdivisions (c) and (d).

2 16. Proposition 65 provides that any person “violating or threatening to violate” Proposition
3 65 may be enjoined in any court of competent jurisdiction. (Health & Safety Code, § 25249.7,
4 subd. (a).) To “threaten to violate” means “to create a condition in which there is a substantial
5 probability that a violation will occur.” (Health & Safety Code, § 25249.11, subd. (e).)
6 Furthermore, violators are subject to a civil penalty of up to \$2,500 per day for each violation.
7 (Health & Safety Code, § 25249.7, subd. (b)(1).

8 V

9 **STATEMENT OF FACTS**

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

13 18. For many years, Innerlight has knowingly and intentionally exposed numerous persons
14 to lead, without providing a Proposition 65 warning. Prior to ERC’s Notice of Violation, Innerlight
15 failed to provide a warning on the label of the Covered Products. Innerlight has at all times relevant
16 hereto been aware that the Covered Products contained lead and that persons using these products
17 have been exposed to the chemical. Innerlight’s website states that the company “conducts
18 independent testing to ensure that we provide the highest quality products. In addition to the
19 standard tests needed to fulfill our MSDS requirements we meticulously test all raw materials and
20 finished products with the use of High-Performance Liquid Chromatography (HPLC), Gas
21 Chromatography (GC) and Mass Spectrometry (MS). In all, we use more than 45 tests and
22 procedures to ensure the quality of the raw materials we use and the finished products we sell.”
23 Innerhealth’s representations indicate that the company has a thorough knowledge of the contents
24 and composition of its products, which would include knowledge of the presence of lead.
25 Nevertheless, the company’s website represents to the public the company’s products are totally
26 pure and safe. Innerlight has been aware of the lead in the Covered Products and has failed to
27 disclose the presence of this chemical to the public, who undoubtedly believed they have been
28 ingesting totally healthy and pure products.

1 19. Both prior and subsequent to ERC's Notice of Violation, Innerlight failed to provide
2 consumers of the Covered Products with a clear and reasonable warning that they have been
3 exposed to a chemical known to the State of California to cause cancer, birth defects and other
4 reproductive harm.

5 **FIRST CAUSE OF ACTION**

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

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

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

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

17 **SECOND CAUSE OF ACTION**

18 **(Declaratory Relief)**

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

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

26 **VI**

27 **PRAYER**

28 WHEREFORE ERC prays for relief as follows:

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

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

7 3. On the Second Cause of Action, for a declaratory judgment pursuant to Code of Civil
8 Procedure section 1060 declaring that Innerlight has exposed individuals to a chemical known to
9 the State of California to cause, birth defects and other reproductive harm without providing clear
10 and reasonable warning; and

11 4. On all Causes of Action, for reasonable attorneys' fees pursuant to section 1021.5 of the
12 Code 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
16 Dated: November 19, 2013

17
18 By



19
20 Michael Freund
21 Attorney for Environmental Research Center
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MICHAEL FREUND
ATTORNEY AT LAW
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November 30, 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 represent Environmental Research Center ("ERC"), 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. (619) 500-3090. ERC's Executive Director is Chris Heptinstall. 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 "the Violators") are:

**Innerlight Holdings, Inc.
Innerlight Worldwide, Inc.**

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

InnerLight Inc. 000117 Men's Formula - Lead

InnerLight 000240 SuperGreens - Lead

InnerLight Inc. 000115 Women's Formula - Lead

InnerLight Inc. 000135 Paracide - Lead

InnerLight 000230 SuperGreens - Lead

InnerLight Worldwide Inc. Earth Essence Montmorillonite Clay Powder - Lead

Exhibit A

InnerLight 000130 Fibrada Plus – Lead

InnerLight Inc. 000113 Adrenal Plus - Lead

InnerLight Inc. 000104 Spectrazyme - Lead

InnerLight 000089 Lymphatica A-Plus - Lead

InnerLight Inc. 000073 Orthoplex II- Lead

InnerLight Inc. Sagrada Plus - Lead

InnerLight Inc. Lung Plus - 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 November 30, 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.

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

November 30, 2012

Page 3

ERC has retained me as legal counsel in connection with this matter. **Please direct all communications regarding this Notice of Violations to my attention at the law office address and telephone number indicated on the letterhead.**

Sincerely,



Michael Freund

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Innerlight Holdings, Inc., Innerlight Worldwide, Inc., and their Registered Agents for Service of Process only)

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

CERTIFICATE OF MERIT

Re: Environmental Research Center's Notice of Proposition 65 Violations by Innerlight Holdings, Inc. and Innerlight Worldwide, Inc.

I, Michael Freund, 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 an attorney for the notifying 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. 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: November 30, 2012



Michael Freund

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 November 30, 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 President or CEO
Innerlight Holdings, Inc.
867 E. 2260 S.
Provo, UT 84606

Kevin P. Brogan
(Innerlight Holdings, Inc.'s Registered Agent for Service
of Process)
867 E. 2260 S.
Provo, UT 84606

Current President or CEO
Innerlight Worldwide, Inc.
867 E. 2260 S.
Provo, UT 84606

Kevin P. Brogan
(Innerlight Worldwide, Inc.'s Registered Agent for Service
of Process)
867 E. 2260 S.
Provo, UT 84606

Registered Agents, Ltd.
(Innerlight Worldwide, Inc.'s Registered Agent for Service
of Process)
1220 N. Market Street, Suite 804
Wilmington, DE 19801

On November 30, 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 November 30, 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 First Class Mail.

Executed on November 30, 2012, in Fort Oglethorpe, Georgia.



Amber Schaub

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

November 30, 2012

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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 4th 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
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San Rafael, CA 94903

District Attorney, Mariposa County
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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, 2nd 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., 3rd 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
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Redding, CA 96001

District Attorney, Sierra County
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Downieville, CA 95936

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Yreka, CA 96097

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Fairfield, CA 94533

District Attorney, Sonoma County
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Santa Rosa, CA 95403

District Attorney, Stanislaus County
832 12th Street, Ste 300
Modesto, CA 95354

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

District Attorney, Tehama County
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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 2nd 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
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16th Floor
San Jose, CA 95113