

**ENDORSED
FILED
ALAMEDA COUNTY**

OCT 25 2013

**CLERK OF THE SUPERIOR COURT
By ~~Patricia LaMotte~~ Deputy**

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8 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 **NUTRITION CENTER, INC. DBA NUTRI-**
17 **WEST and DOES 1-100**

18 **Defendants.**

CASE NO. RG13700610

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

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

19 Plaintiff Environmental Research Center hereby alleges:

20 **I**

21 **INTRODUCTION**

22
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 Nutrition Center, Inc. dba Nutri-West and Does 1-100
27 (hereinafter "Nutri-West")'s failure to warn consumers that they have been exposed to lead from
28 several of Nutri-West's nutritional health products. Lead is a chemical known to the State of

1 California to cause cancer, birth defects and other reproductive harm. Based on the Safe Drinking
2 Water and Toxic Enforcement Act of 1986 (Health & Safety Code section 25249.5 *et seq.*) also
3 known as "Proposition 65," businesses with ten or more employees must provide a "clear and
4 reasonable 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 Nutri-West 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 Nutri-West Whole System D-TX; Nutri-West
14 China-West #16 Lonicera Formula; Nutri-West Parazym-A; Nutri-West #10-FEM; Nutri-West
15 Stress/Pan-F; Nutri-West D-Tox; Nutri-West Total Fiber; Nutri-West China-West #2 Sino Formula;
16 Nutri-West DIU-Plus; Nutri-West LIGA-PN; and Nutri-West #15 ILEX Formula. Nutri-West is a
17 company subject to Proposition 65 as it employs ten or more persons.

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

25 III

26 JURISDICTION AND VENUE

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

1 6. The Complaint is based on allegations contained in a Notice of Violation dated
2 January 18, 2013, served on the California Attorney General, other public enforcers and Nutri-
3 West. A true and correct copy of the Notice of Violation is attached as Exhibit A. More than 60
4 days have passed since the Notice of Violation was mailed and no public enforcement entity has
5 filed a complaint in this case.

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

10 IV

11 STATUTORY BACKGROUND

12 A. Proposition 65

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

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

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

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

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

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

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

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

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

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

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

1 probability that a violation will occur.” (Health & Safety Code, § 25249.11, subd. (e).)
2 Furthermore, violators are subject to a civil penalty of up to \$2,500 per day for each violation.
3 (Health & Safety Code, § 25249.7, subd. (b)(1).
4

5 V

6 **STATEMENT OF FACTS**

7 17. Nutri-West has manufactured, distributed and/or sold the Covered Products
8 containing lead into 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 18. For many years, Nutri-West has knowingly and intentionally exposed numerous
11 persons to lead, without providing a Proposition 65 warning. Prior to ERC’s Notice of Violation,
12 Nutri-West failed to provide a warning on the label of the Covered Products. Nutri-West has at all
13 times relevant hereto been aware that the Covered Products contained lead and that persons using
14 these products have been exposed to the chemical. Nutri-West’s website states that the company’s
15 “product formulations and production methods have been carefully designed” and that “Nutri-West
16 products are made to the industry’s most exacting standards. Each of the more than 3,800 raw
17 materials used in our formulations undergoes regular, random laboratory analysis to assure purity
18 and potency.” Such exacting formulation and production methods paired with extensive testing
19 have undoubtedly revealed the presence of lead in the Covered Products to Nutri-West.
20 Nevertheless, the company’s website represents to the public the company “maintain(s) an absolute
21 commitment to product quality, purity and efficacy.” Nutri-West has been aware of the lead in the
22 Covered Products and has failed to disclose the presence of this chemical to the public, who
23 undoubtedly believed they have been ingesting totally healthy and pure products.

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

1 **FIRST CAUSE OF ACTION**

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

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

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

11 22. Said violations render Nutri-West liable for civil penalties up to \$2,500 per day, for
12 each violation.

13 **SECOND CAUSE OF ACTION**

14 **(Declaratory Relief)**

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

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

22 **VI**

23 **PRAYER**

24 WHEREFORE ERC prays for relief as follows:

- 25 1. On the First Cause of Action, for civil penalties for each and every violation according to
26 proof;
- 27 2. On the First Cause of Action, and pursuant to Health & Safety Code section 25249.7,
28 subdivision (a), for such temporary restraining orders, preliminary and permanent injunctive orders.

1 or other orders, prohibiting Nutri-West from exposing persons to lead without providing clear and
2 reasonable warning;

3 3. On the Second Cause of Action, for a declaratory judgment pursuant to Code of Civil
4 Procedure section 1060 declaring that Nutri-West has exposed individuals to a chemical known to
5 the State of California to cause, birth defects and other reproductive harm without providing clear
6 and reasonable warning; and

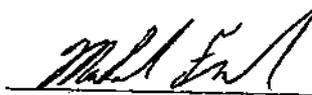
7 4. On all Causes of Action, for reasonable attorneys' fees pursuant to section 1021.5 of the
8 Code of Civil Procedure or the substantial benefit theory;

9 5. For costs of suit herein; and

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

11
12 Dated: October 24, 2013

13
14 By



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16 Michael Freund
17 Attorney for Environmental Research Center
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January 18, 2013

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

Dear Alleged Violator 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 reducing 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 as 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 Violator identified below failed to provide the required clear and reasonable warnings with these products. This letter serves as a notice of these violations to the alleged Violator and the appropriate public enforcement agencies. Pursuant to Health and Safety Code Section 25249.7(d), 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 attached with the copy of this letter served to the alleged Violator identified below.

Alleged Violator. The name of the company covered by this notice and who violated Proposition 65 (hereinafter "the Violator") is:

Nutrition Center, Inc. (dba Nutri-West)

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:

- **Nutri-West Whole System D-TX – Lead**
- **Nutri-West China-West #16 Lonicera Formula – Lead**
- **Nutri-West Parazym-A – Lead**
- **Nutri-West #10-FEM – Lead**
- **Nutri-West Stress/Pan-F – Lead**
- **Nutri-West D-Tox – Lead**
- **Nutri-West Total Fiber – Lead**
- **Nutri-West China-West #2 Sino Formula – Lead**
- **Nutri-West DIU-Plus – Lead**
- **Nutri-West LIGA-PN – Lead**
- **Nutri-West #15 ILEX Formula – Lead**

EXHIBIT A

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.

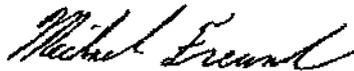
Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to these chemicals has been and continues to be through ingestion, but may have also occurred 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 January 18, 2010, as well as every day since the products were introduced into the California marketplace, and will continue every day until the Violator provides clear and reasonable warnings to product purchasers and users or until these known toxic chemicals are either removed from the products or reduced to allowable levels. 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 Violator violated Proposition 65 because they failed to provide persons handling and/or using these products with appropriate warnings that those persons 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 Violator 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 expensive and time-consuming litigation.

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 Nutrition Center, Inc., dba Nutri-West, and their Registered Agent)

Additional Information Supporting Certificate of Merit (to AG only)

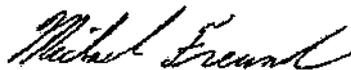
CERTIFICATE OF MERIT

Re: Environmental Research Center's Notice of Proposition 65 Violations by Nutrition Center, Inc. (dba Nutri-West)

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 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 Violator will be able to establish any of the affirmative defenses set forth in the statute.
5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: January 18, 2013



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 January 18, 2013, 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 parties listed below and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Paul A. White, Current President or CEO
Nutrition Center, Inc. (dba Nutri-West)
2132 E. Richards Street
Douglas, WY 82633

Paul A. White, Registered Agent of Nutrition Center, Inc. (dba Nutri-West)
Airport Strip
PO Box 6
Douglas, WY 82633

Current President or CEO
Nutrition Center, Inc. (dba Nutri-West)
PO Box 950
Douglas, WY 82633

On January 18, 2013, 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 at a U.S. 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 January 18, 2013, 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 at a U.S. Postal Service Office with the postage fully prepaid for delivery by Priority Mail.

Executed on January 18, 2013, in Fort Oglethorpe, Georgia.



Amber Schaub

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

January 18, 2013

Page 5

Service List

District Attorney, Alameda County
1225 Fallon Street, Suite 900
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District Attorney, Alpine County
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Jackson, CA 95642

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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

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Crescent City, CA 95531

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Bishop, CA 93514

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Bakersfield, CA 93301

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Hanford, CA 93230

District Attorney, Lake County
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Lakeport, CA 95453

District Attorney, Lassen County
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Susanville, CA 96130

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Santa Ana, CA 92701

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San Bernardino, CA 92415-0004

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Santa Barbara, CA 93101

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Yreka, CA 96097

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Fairfield, CA 94533

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District Attorney, Stanislaus County
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Modesto, CA 95354

District Attorney, Sutter County
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Yuba City, CA 95991

District Attorney, Tehama County
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District Attorney, Trinity County
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Weaverville, CA 96093

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Visalia, CA 93291

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Sonora, CA 95370

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Ventura, CA 93009

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Woodland, CA 95695

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Los Angeles, CA 90012

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San Diego, CA 92101

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1 Dr Carlton B Goodlett PL
San Francisco, CA 94102

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200 East Santa Clara Street,
16th Floor
San Jose, CA 95113