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4 Email: richard@lozeaudrury.com

5 Attorneys for Plaintiff  
ENVIRONMENTAL RESEARCH CENTER

**ENDORSED  
FILED  
ALAMEDA COUNTY**  
OCT 24 2013  
CLERK OF THE SUPERIOR COURT  
**MARGARET J. DOWNL**  
Deputy

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF ALAMEDA

10 ENVIRONMENTAL RESEARCH CENTER, )  
11 a non-profit California corporation, )

12 Plaintiff, )

13 v. )

14 AL GLOBAL CORPORATION, a California )  
15 Corporation, )

16 Defendant. )

Case No. **RG13700552**

**COMPLAINT FOR INJUNCTIVE  
RELIEF AND CIVIL PENALTIES**

Health & Safety Code §25249.5, *et seq.*

17  
18 Plaintiff Environmental Research Center brings this action in the interests of the  
19 general public and, on information and belief, hereby alleges:

20 **INTRODUCTION**

21 1. This action seeks to remedy Defendant's continuing failure to warn consumers  
22 in California that they are being exposed to lead and/or lead compounds, substances known to  
23 the State of California to cause cancer, birth defects and other reproductive harm. Defendant  
24 manufactures, packages, distributes, markets, and/or sells in California certain products  
25 containing lead and/or lead compounds (the "PRODUCTS") including:

26 **Healing The Globe Scarlar Enhanced Detoxal 21  
Livinity Livin Slim Plus**

1                   **Livinity Stress-ese Plus**  
2                   **Youngevity R-Garden Milk Thistle Formula**  
3                   **R-Garden Inc. Memory Formula**  
4                   **Youngevity R-Garden Brown Seaweed Extract Formula**  
5                   **R-Garden Inc. Herbal Blends Female Hormone System**  
6                   **Youngevity R-Garden Green Energy Plus**  
7                   **R-Garden Inc. Herbal Blends Eyes System**  
8                   **R-Garden Inc. Herbal Blends Immune Fungi System**  
9                   **R-Garden Inc. Herbal Blends Liver Gallbladder System**  
10                  **R-Garden Inc. Bowel Toner**  
11                  **R-Garden Inc. Herbal Blends Thyroid System**  
12                  **R-Garden Inc. Herbal Blends Respiratory Lung**  
13                  **R-Garden Inc. Sun Energy**  
14                  **Youngevity Premium Women's Hormonal Balancer**  
15                  **Ancient Legacy Ocean's Gold**  
16                  **Scalar Core International Scalar Enhanced Colon Activator**  
17                  **Youngevity A J.D. Wallach Corporation D'Tox FX**  
18                  **Healing The Globe Reshape America Ameri Trim**  
19                  **Youngevity Ultimate Youth**  
20                  **Youngevity Slender FX Meal Replacement Shake Vanilla**  
21                  **Youngevity Slender FX Meal Replacement Shake Chocolate**  
22                  **True2life Fast Food Chocolate**  
23                  **True2life Fast Food Vanilla**  
24                  **True2life True Cleanse**  
25                  **Youngevity A J.D. Wallach Corporation Majestic Earth –**  
26                  **Ultimate Osteo-FX**

2.       Lead and lead compounds (hereinafter, the “LISTED CHEMICALS”) are substances known to the State<sup>1</sup> 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 CHEMICALS 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

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

1 involuntarily and unwittingly exposed to levels of the LISTED CHEMICALS that violate  
2 Proposition 65.

3 5. Plaintiff seeks injunctive relief enjoining Defendant from the continued  
4 manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in  
5 California without provision of clear and reasonable warnings regarding the risks of cancer,  
6 birth defects and other reproductive harm posed by exposure to the LISTED CHEMICALS  
7 through the use and/or handling of the PRODUCTS. Plaintiff seeks an injunctive order  
8 compelling Defendant to bring its business practices into compliance with Proposition 65 by  
9 providing a clear and reasonable warning to each individual who has been and who in the  
10 future may be exposed to LISTED CHEMICALS from the use of the PRODUCTS. Plaintiff  
11 also seeks an order compelling Defendant to identify and locate each individual person who in  
12 the past has purchased the PRODUCTS, and to provide to each such purchaser a clear and  
13 reasonable warning that the use of the PRODUCTS will cause exposures to the LISTED  
14 CHEMICALS.

15 6. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties in  
16 excess of \$24.5 million to remedy Defendant's failure to provide clear and reasonable  
17 warnings regarding exposures to the LISTED CHEMICALS.

18 **JURISDICTION AND VENUE**

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

23 8. This Court has jurisdiction over Defendant because, based on information and  
24 belief, Defendant is a business having sufficient minimum contacts with California, or  
25 otherwise intentionally availing itself of the California market through the distribution and sale  
26 of the PRODUCTS in the State of California to render the exercise of jurisdiction over it by the

1 California courts consistent with traditional notions of fair play and substantial justice.

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

4 **PARTIES**

5 10. PLAINTIFF Environmental Research Center (“PLAINTIFF” or “ERC”) is a  
6 corporation organized under California’s Corporation Law. ERC is dedicated to, among other  
7 causes, reducing the use and misuse of hazardous and toxic substances, consumer protection,  
8 worker safety and corporate responsibility.

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

11 12. Defendant AL GLOBAL CORPORATION (“DEFENDANT” or “AL  
12 Global”) is a corporation organized under California’s Corporation Law and is a person  
13 doing business within the meaning of H&S Code §25249.11 with an office at 2400  
14 Boswell Road, Chula Vista, CA 91914.

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

17 **STATUTORY BACKGROUND**

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

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

25 No person in the course of doing business shall knowingly and intentionally  
26 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....



1 intentionally exposed the users and/or handlers of the PRODUCTS to LISTED CHEMICALS  
2 without first giving a clear and reasonable warning to such individuals.

3 21. The PRODUCTS have been sold by DEFENDANT for use in California  
4 since at least May 17, 2010. The PRODUCTS continue to be distributed and sold in  
5 California without the requisite warning information.

6 22. On May 17, 2013, ERC served DEFENDANT and each of the appropriate  
7 public enforcement agencies with a document entitled "Notice of Violations of California  
8 Health & Safety Code Section 25249.5 " that provided DEFENDANT and the public  
9 enforcement agencies with notice that DEFENDANT was in violation of Proposition 65 for  
10 failing to warn purchasers and individuals using the Products that the use of the Products  
11 exposes them to lead, a chemical known to the State of California to cause cancer and/or  
12 reproductive toxicity ("**Prop. 65 Notice**") (a copy of the 60-Day Notice is attached hereto as  
13 **Exhibit A**).

14 23. As a proximate result of acts by AL Global, as a person in the course of doing  
15 business within the meaning of Health & Safety Code §25249.11, individuals throughout the  
16 State of California, including in the County of Alameda, have been exposed to the LISTED  
17 CHEMICALS without clear and reasonable warning. The individuals subject to the violative  
18 exposures include normal and foreseeable users of the PRODUCTS, as well as all other  
19 persons exposed to the PRODUCTS.

20 **FIRST CAUSE OF ACTION**

21 **Injunctive Relief for Violations of Health and Safety Code § 25249.5, et seq. concerning**  
22 **the PRODUCTS described in the May 17, 2013 Prop. 65 Notice**  
23 **Against AL Global**

24 24. PLAINTIFF realleges and incorporates by reference Paragraphs 1 through 23,  
25 inclusive, as if specifically set forth herein

26 25. On May 17, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65  
violations to the requisite public enforcement agencies, and to DEFENDANT ("**Notice**")  
attached hereto as Exhibit A. The Notice was issued pursuant to, and in compliance with, the

1 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding  
2 the notice of the violations to be given to certain public enforcement agencies and to the  
3 violator. The notice given included, *inter alia*, the following information: the name, address,  
4 and telephone number of the noticing individual; the name of the alleged violator; the statute  
5 violated; the approximate time period during which violations occurred; and descriptions of the  
6 violations, including the chemicals involved, the routes of toxic exposure, and the specific  
7 product or type of product causing the violations, and was issued as follows:

- 8 a. DEFENDANT was provided a copy of the Notice by Certified Mail.
- 9 b. DEFENDANT was provided a copy of a document entitled "The Safe  
10 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A  
11 Summary," which is also known as Appendix A to Title 27 of CCR  
12 §25903.
- 13 c. The California Attorney General was provided a copy of the Notice via  
14 online submission.
- 15 d. The California Attorney General was provided with a Certificate of Merit  
16 by the attorney for the noticing party, stating that there is a reasonable  
17 and meritorious case for this action, and attaching factual information  
18 sufficient to establish a basis for the certificate, including the identify of  
19 the persons consulted with and relied on by the certifier, and the facts,  
20 studies, or other data reviewed by those persons, pursuant to H&S Code  
21 §25249.7(h) (2).

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

25 27. By committing the acts alleged in this Complaint DEFENDANT at all times  
26 relevant to this action, and continuing through the present, has violated H&S Code §25249.6 by,

1 in the course of doing business, knowingly and intentionally exposing individuals who use or  
2 handle the PRODUCTS set forth in the Notice to the LISTED CHEMICALS, without first  
3 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6  
4 and 25249.11(f).

5 28. By the above-described acts, DEFENDANT has violated H&S Code §  
6 25249.6 and is therefore subject to an injunction ordering DEFENDANT to stop violating  
7 Proposition 65, to provide warnings to all present and future customers and to provide warnings  
8 to DEFENDANT'S past customers who purchased or used the PRODUCTS without receiving  
9 a clear and reasonable warning.

10 29. An action for injunctive relief under Proposition 65 is specifically authorized  
11 by Health & Safety Code §25249.7(a).

12 30. Continuing commission by DEFENDANT of the acts alleged above will  
13 irreparably harm the citizens of the State of California, for which harm they have no plain,  
14 speedy, or adequate remedy at law.

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

16 **SECOND CAUSE OF ACTION**

17 **Civil Penalties for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the**  
18 **PRODUCTS described in PLAINTIFF'S NOTICE**  
19 **Against AL Global**

20 31. PLAINTIFF realleges and incorporates by reference Paragraphs 1 through  
21 30, inclusive, as if specifically set forth herein.

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



1           33.           By the above-described acts, DEFENDANT is liable, pursuant to H&S Code  
 2 §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to a  
 3 LISTED CHEMICAL from the PRODUCTS, in an amount in excess of \$24.5 million.

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

5                                   **THE NEED FOR INJUNCTIVE RELIEF**

6           34.           PLAINTIFF realleges and incorporates by this reference Paragraphs 1  
 7 through 33, as if set forth below.

8           35.           By committing the acts alleged in this Complaint, DEFENDANT has caused  
 9 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence  
 10 of equitable relief, DEFENDANT will continue to create a substantial risk of irreparable injury  
 11 by continuing to cause consumers to be involuntarily and unwittingly exposed to the LISTED  
 12 CHEMICALS through the use and/or handling of the PRODUCTS.

13                                   **PRAYER FOR RELIEF**

14           Wherefore, PLAINTIFF accordingly prays for the following relief:

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

20           B.           an injunctive order, pursuant to H&S Code §25249.7(b), compelling  
 21 DEFENDANT to identify and locate each individual who has purchased the PRODUCTS since  
 22 May 17, 2012, and to provide a warning to such person that the use of the PRODUCTS will  
 23 expose the user to chemicals known to cause cancer, birth defects, and other reproductive  
 24 harm.

25           C.           an assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),  
 26 against DEFENDANT in the amount of \$2,500 per day for each violation of Proposition 65, in

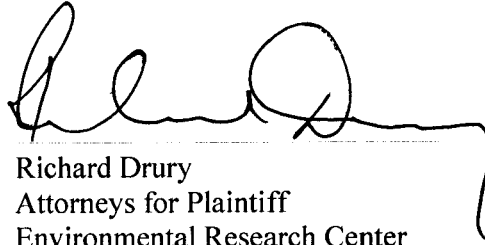
1 an amount in excess of \$24.5 million;

2 D. an award to PLAINTIFF of its reasonable attorneys fees and costs of suit  
3 pursuant to California Code of Civil Procedure §1021.5, as PLAINTIFF shall specify in further  
4 application to the Court; and,

5 E. such other and further relief as may be just and proper.

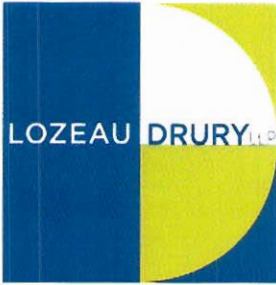
6 DATED: October 24, 2013

Lozeau|Drury LLP

7  
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9  
10 Richard Drury  
11 Attorneys for Plaintiff  
12 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  
AL Global Corporation  
2400 Boswell Road  
Chula Vista, CA 91914

Ned Ardagna  
(AL Global Corporation's  
Registered Agent for Service of Process)  
571 Third Avenue  
Chula Vista, CA 91910

**VIA PRIORITY MAIL**

District Attorneys of All California Counties  
and Select City Attorneys  
(See Attached Certificate of Service)

**VIA ONLINE SUBMISSION**

Office of the California Attorney General

**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 name of the Company covered by this notice that violated Proposition 65 (hereinafter the "Violator") is:

**AL Global Corporation**

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

**Healing The Globe Scarlar Enhanced Detoxal 21 – Lead**  
**Livinity Livin Slim Plus – Lead**  
**Livinity Stress-ese Plus – Lead**  
**Youngevity R-Garden Milk Thistle Formula – Lead**  
**R-Garden Inc. Memory Formula – Lead**  
**Youngevity R-Garden Brown Seaweed Extract Formula – Lead**  
**R-Garden Inc. Herbal Blends Female Hormone System – Lead**  
**Youngevity R-Garden Green Energy Plus – Lead**  
**R-Garden Inc. Herbal Blends Eyes System – Lead**  
**R-Garden Inc. Herbal Blends Immune Fungi System – Lead**  
**R-Garden Inc. Herbal Blends Liver Gallbladder System – Lead**  
**R-Garden Inc. Bowel Toner – Lead**  
**R-Garden Inc. Herbal Blends Thyroid System – Lead**  
**R-Garden Inc. Herbal Blends Respiratory Lung – Lead**  
**R-Garden Inc. Sun Energy – Lead**  
**Youngevity Premium Women’s Hormonal Balancer – Lead**  
**Ancient Legacy Ocean’s Gold – Lead**  
**Scalar Core International Scalar Enhanced Colon Activator – Lead**  
**Youngevity A J.D. Wallach Corporation D’Tox FX – Lead**  
**Healing The Globe Reshape America Ameri Trim – Lead**  
**Youngevity Ultimate Youth – Lead**  
**Youngevity Slender FX Meal Replacement Shake Vanilla – Lead**  
**Youngevity Slender FX Meal Replacement Shake Chocolate – Lead**  
**True2Life Fast Food Chocolate – Lead**  
**True2Life Fast Food Vanilla – Lead**  
**True2Life True Cleanse – Lead**  
**True2Life True Kids – Lead**  
**Youngevity A J.D. Wallach Corporation Majestic Earth Ultimate Osteo-FX – 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.

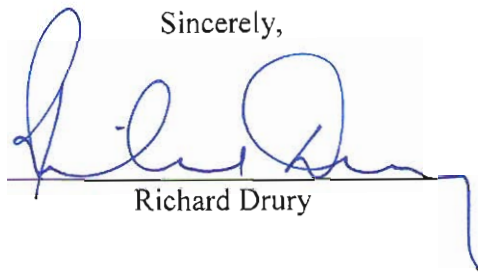
This letter is a notice to the Violator and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violator currently known to ERC from the information now available. ERC may continue 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 Violator.

The Violator has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. 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 lead 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 lead. The method of warning should be a warning that appears on the product's label. The Violator violated Proposition 65 because it failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since May 17, 2010, 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 Violator agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to lead; 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 chemical and expensive and time-consuming litigation.

ERC's Executive Director is Chris Heptinstall, and it 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

Certificate of Service

OEHHA Summary (to AL Global Corporation and its Registered Agent for Service of Process only)

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

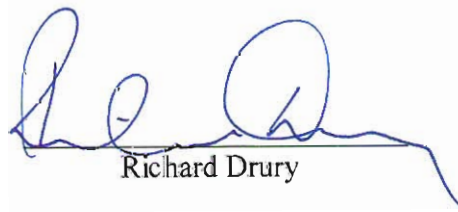
**CERTIFICATE OF MERIT**

**Re: Environmental Research Center's Notice of Proposition 65 Violations by  
AL Global Corporation**

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 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: May 17, 2013



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 May 17, 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:

Current CEO or President  
AL Global Corporation  
2400 Boswell Road  
Chula Vista, CA 91914

Ned Ardagna  
(AL Global Corporation's  
Registered Agent for Service of Process)  
571 Third Avenue  
Chula Vista, CA 91910

On May 17, 2013, I electronically 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 party by uploading a true and correct copy thereof on the California Attorney General's website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice> :

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

On May 17, 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 May 17, 2013, in Fort Oglethorpe, Georgia.

  
\_\_\_\_\_  
Rebecca Turner-Smith



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

May 17, 2013

Page 6

Service List

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

District Attorney, Los Angeles County  
210 West Temple Street, Suite 1800  
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<sup>nd</sup> Street  
Woodland, CA 95695

District Attorney, Butte County  
25 County Center Drive, Suite 245  
Oroville, 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<sup>rd</sup> Floor  
Redwood City, CA 94063

Los Angeles City Attorney's Office  
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