

ENDORSED
FILED
ALAMEDA COUNTY

MAR 17 2014

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10 ENVIRONMENTAL RESEARCH CENTER

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF ALAMEDA

13 ENVIRONMENTAL RESEARCH CENTER,)
14 a non-profit California corporation,)
15 Plaintiff,)
16 v.)
17 SENSEA PRODUCTS, LLC, a California)
18 Limited Liability Company,)
19 Defendant.)

Case No.

RG147-7662

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

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

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

INTRODUCTION

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

SENSEA Products LLC SENSEA Quench Pink Grapefruit

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

3 3. The use and/or handling of the PRODUCT causes exposures to the LISTED
4 CHEMICAL at levels requiring a "clear and reasonable warning" under California's Safe
5 Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code ("H&S Code")
6 §25249.5, *et seq.* (also known as "Proposition 65"). Defendant has failed to provide the health
7 hazard warnings required by Proposition 65.

8 4. Defendant's continued manufacturing, packaging, distributing, marketing and/or
9 sales of the PRODUCT without the required health hazard warnings, causes individuals to be
10 involuntarily and unwittingly exposed to levels of the LISTED CHEMICALS that violate
11 Proposition 65.

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

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

1 6. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties in
2 excess of \$1 million to remedy Defendant’s failure to provide clear and reasonable warnings
3 regarding exposures to the LISTED CHEMICAL.

4 **JURISDICTION AND VENUE**

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

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

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

16 **PARTIES**

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

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

23 12. Defendant SENZA Products, LLC (“DEFENDANT” or “Sensa”) is a
24 limited liability company organized under California’s Corporation Law and is a person
25 doing business within the meaning of H&S Code §25249.11 with an office at 2301
26 Rosecrans Avenue, #1150, El Segundo, California, 90245.

1 13. DEFENDANT manufactures, packages, distributes, markets and/or sells the
2 PRODUCT for sale or use in California and in Alameda County.

3 **STATUTORY BACKGROUND**

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

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

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

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

20 **FACTUAL BACKGROUND**

21 17. On February 27, 1987, the State of California officially listed the chemical lead
22 as a chemical known to cause reproductive toxicity. Lead became subject to the warning
23 requirement one year later and was therefore subject to the "clear and reasonable" warning
24 requirements of Proposition 65 beginning on February 27, 1988. (27 California Code of
25 Regulations ("CCR") §25000, *et seq.*; H&S Code §25249.5, *et seq.*).

26 18. On October 1, 1992, the State of California officially listed the chemical lead as
a chemical known to cause cancer. Lead became subject to the warning requirement one year
later and was therefore subject to the "clear and reasonable" warning requirements of

1 Proposition 65 beginning on October 1, 1993. (27 CCR § 25000, *et seq.*; H&S Code §25249.6,
2 *et seq.*). Due to the high toxicity of lead, the maximum allowable dose level for lead is 0.5
3 ug/day (micrograms a day) for reproductive toxicity.

4 19. To test Sensa's PRODUCT for lead, Plaintiff hired a well-respected and
5 accredited testing laboratory that designed the testing protocol used and approved by the
6 California Attorney General years ago for testing heavy metals. The testing results undertaken
7 by PLAINTIFF of Sensa's PRODUCT showed that the PRODUCT tested contained lead at
8 levels far in excess of the Proposition 65 0.5 ug/day "safe harbor" daily dose limit. Very
9 significant is the fact that people are being exposed to lead through ingestion as opposed to
10 other not as harmful methods of exposure such as dermal exposure. Ingestion of lead produces
11 much higher exposure levels and health risks than dermal exposure to this chemical.

12 20. At all times relevant to this action, Sensa therefore has knowingly and
13 intentionally exposed the users and/or handlers of the PRODUCT to the LISTED CHEMICAL
14 without first giving a clear and reasonable warning to such individuals.

15 21. The PRODUCT has been sold by DEFENDANT for use in California
16 since at least May 17, 2010. The PRODUCT continues to be distributed and sold in
17 California without the requisite warning information.

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

26 23. As a proximate result of acts by Sensa, as a person in the course of doing

1 business within the meaning of Health & Safety Code §25249.11, individuals throughout the
2 State of California, including in the County of Alameda, have been exposed to the LISTED
3 CHEMICAL without clear and reasonable warning. The individuals subject to the violative
4 exposures include normal and foreseeable users of the PRODUCT, as well as all other persons
5 exposed to the PRODUCT.

6 **FIRST CAUSE OF ACTION**

7 **Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning
8 the PRODUCT described in the May 17, 2013 Prop. 65 Notice
9 Against Sensa**

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

12 25. On May 17, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65
13 violations to the requisite public enforcement agencies, and to DEFENDANT (“Notice”)
14 attached hereto as Exhibit A. The Notice was issued pursuant to, and in compliance with, the
15 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding
16 the notice of the violations to be given to certain public enforcement agencies and to the
17 violator. The notice given included, *inter alia*, the following information: the name, address,
18 and telephone number of the noticing individual; the name of the alleged violator; the statute
19 violated; the approximate time period during which violations occurred; and descriptions of the
20 product or type of product causing the violations, and was issued as follows:

- 21 a. DEFENDANT was provided a copy of the Notice by Certified Mail.
- 22 b. DEFENDANT was provided a copy of a document entitled "The Safe
23 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
24 Summary," which is also known as Appendix A to Title 27 of CCR
25 §25903.
- 26 c. The California Attorney General was provided a copy of the Notice via
online submission.

1 d. The California Attorney General was provided with a Certificate of Merit
2 by the attorney for the noticing party, stating that there is a reasonable
3 and meritorious case for this action, and attaching factual information
4 sufficient to establish a basis for the certificate, including the identify of
5 the persons consulted with and relied on by the certifier, and the facts,
6 studies, or other data reviewed by those persons, pursuant to H&S Code
7 §25249.7(h) (2).

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

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

17 28. By the above-described acts, DEFENDANT has violated H&S Code §
18 25249.6 and is therefore subject to an injunction ordering DEFENDANT to stop violating
19 Proposition 65, to provide warnings to all present and future customers and to provide warnings
20 to DEFENDANT'S past customers who purchased or used the PRODUCTS without receiving
21 a clear and reasonable warning.

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

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

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

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2 **SECOND CAUSE OF ACTION**
3 **Civil Penalties for Violations of Health and Safety Code § 25249.5, et seq. concerning the**
4 **PRODUCT described in PLAINTIFF's NOTICE**
5 **Against Sensa**

6 31. PLAINTIFF realleges and incorporates by reference Paragraphs 1 through
7 30, inclusive, as if specifically set forth herein.

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

14 33. By the above-described acts, DEFENDANT is liable, pursuant to H&S Code
15 §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to a
16 LISTED CHEMICAL from the PRODUCT, in an amount in excess of \$1 million.

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

18 **THE NEED FOR INJUNCTIVE RELIEF**

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

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

26 **PRAYER FOR RELIEF**

Wherefore, PLAINTIFF accordingly prays for the following relief:

A. a preliminary and permanent injunction, pursuant to H&S Code §25249.7(b),

1 enjoining DEFENDANT, its agents, employees, assigns and all persons acting in concert or
2 participating with DEFENDANT, from distributing or selling the PRODUCT in California
3 without first providing a clear and reasonable warning, within the meaning of Proposition 65,
4 that the users and/or handlers of the PRODUCT are exposed to the LISTED CHEMICAL.

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


10 C. an assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
11 against DEFENDANT in the amount of \$2,500 per day for each violation of Proposition 65, in
12 an amount in excess of \$1 million;

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

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

17 DATED: March 17, 2014

Lozeau|Drury LLP

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Richard Drury
Attorneys for Plaintiff
Environmental Research Center

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Exhibit A



Environmental Research Center

3111 Camino Del Rio North, Suite 400
San Diego, CA 92108
619-500-3090

May 17, 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 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 Violator 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 Violator 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 Violator identified below.

Alleged Violator. The name of the company covered by this notice that violated Proposition 65 (hereinafter collectively referred to as the “Violator”) is:

Sensa Products, 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:

SENSA Products LLC Sensa Quench Pink Grapefruit – 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 May 17, 2010, 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 Violator 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 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 an expensive and time consuming litigation.

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

Sincerely,



Chris Heptinstall
Executive Director
Environmental Research Center

Attachments

- Certificate of Merit
- Certificate of Service
- OEHHA Summary (to Sensa Products, LLC 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
Sensa Products, LLC**

I, Chris Heptinstall, declare:

1. This Certificate of Merit accompanies the attached 60-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.

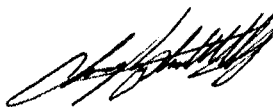
2. I am the Executive Director for the noticing party.

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 Violator 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: May 17, 2013



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 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 party listed below and depositing it in a US Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

President or CEO
Sensa Products, LLC
2301 Rosecrans Avenue #1150
El Segundo, CA 90245

GKL Corporate/Search, Inc.
(Registered Agent of Sensa Products, LLC)
P.O. Box 1913
Sacramento, CA 95812


President or CEO
Sensa Products, LLC
2301 Rosecrans Avenue, Suite 4100
El Segundo, CA 90245

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 with the U.S. Postal Service with the postage fully prepaid for delivery by Priority Mail.

Executed on May 17, 2013, in Fort Oglethorpe, Georgia.


Rebecca Turner-Smith
Rebecca Turner-Smith

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*
May 17, 2013
Page 5

Service List

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