

**EMBRASED
FILED
ALAMEDA COUNTY**

JAN 28 2014

**CLERK OF THE SUPERIOR COURT
By Molly Kautz**

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

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

14 **Plaintiff,**

15 **vs.**

16 **RHG & COMPANY, INC. dba VITAL**
17 **NUTRIENTS and DOES 1-100**

18 **Defendants.**

CASE NO. *RG14711723*

**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 RHG & Company, Inc. dba Vital Nutrients and Does 1-100
27 (hereinafter "RHG")'s failure to warn consumers that they have been exposed to lead from several of
28 RHG's nutritional health products. Lead is a chemical known to the State of California to cause

1 cancer, birth defects and other reproductive harm. Based on the Safe Drinking Water and Toxic
2 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
6 **II**
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 RHG is a business that manufactures, distributes and/or sells nutritional health
12 products that have exposed users to lead in the State of California within the relevant statute of
13 limitations period. These "Covered Products" are Vital Nutrients Berberine, Vital Nutrients Blood
14 Sugar Support, Vital Nutrients Energy Plus, Vital Nutrients Adrenal Support, Vital Nutrients
15 Astragalus Root Extract 300mg, Vital Nutrients BCQ, Vital Nutrients Vital Kids Berry Well
16 Immune Support, Vital Nutrients GI Repair Powder, Vital Nutrients Calm Aide with Sensoril, Vital
17 Nutrients Vital Clear, Vital Nutrients Rhodiola Rosea 3% 200 mg, Vital Nutrients Osteo-Nutrients
18 II (with Vitamin K2-7), Vital Nutrients Reishi Mushroom 500mg, Vital Nutrients Herbal Biotic,
19 Vital Nutrients Goldenseal Plus, Vital Nutrients Menopause Support, Vital Nutrients Immune
20 Support, Vital Nutrients Milk Thistle Extract 250mg, Vital Nutrients ViraCon, and Vital Nutrients
21 Saw Palmetto Pygeum Nettle Root. RHG is a company subject to Proposition 65 as it employs ten
22 or more persons.

23 4. Defendants Does 1-100, are named herein under fictitious names, as their true names and
24 capacities are unknown to ERC. ERC is informed and believes, and thereon alleges, that each of
25 said Does is responsible, in some actionable manner, for the events and happenings hereinafter
26 referred to, either through said Defendant's conduct, or through the conduct of its agents, servants or
27 employees, or in some other manner, causing the harms alleged by ERC in this complaint. When
28

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

3
4 **III**

5 **JURISDICTION AND VENUE**

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

8 6. The Complaint is based on allegations contained in a Notice of Violation dated
9 September 13, 2013, served on the California Attorney General, other public enforcers and RHG.
10 A true and correct copy of the Notice of Violation is attached as Exhibit A. More than 60 days
11 have passed since the Notice of Violation was mailed and no public enforcement entity has filed
12 a complaint in this case.

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

17 **IV**

18 **STATUTORY BACKGROUND**

19 **A. Proposition 65**

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

22 9. The warning requirement of Proposition 65 is contained in Health & Safety Code section
23 25249.6, which provides:

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

28 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

1 and any other environmental exposure as well as occupational exposures.” (Cal. Code Regs., tit. 27,
2 § 25102, subd. (i).)

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

9 12. Whenever a clear and reasonable warning is required under Health & Safety Code
10 section 25249.6, the “method employed to transmit the warning must be reasonably calculated
11 considering the alternative methods available under the circumstances, to make the warning
12 message available prior to exposure.” (Cal. Code Regs., tit. 27, § 25601.) The warning requirement
13 may be satisfied by a warning that appears on a product’s label or other labeling, shelf labeling,
14 signs, a system of signs, public advertising identifying the system and toll-free information services,
15 or any other, system, that provides clear and reasonable warnings. (Cal. Code Regs., tit. 27, §
16 25603.1, subd. (a)-(d).)

17 13. Proposition 65 establishes a procedure by which the State is to develop a list of
18 chemicals “known to the State to cause cancer or reproductive toxicity.” (Health & Safety Code,
19 § 25249.8.) There is no duty to provide a clear and reasonable warning until 12-months after the
20 chemical was published on the State list. (Health & Safety Code, § 25249.10, subd. (b).) Lead
21 was listed as a chemical known to the State of California to cause developmental toxicity in the
22 fetus and male and female reproductive toxicity on February 27, 1987. Lead was listed as a
23 chemical known to the State of California to cause cancer on October 1, 1992. (Cal. Code Regs., tit.
24 27, § 27001.)

25 14. The Maximum Allowable Dose Level for lead as a chemical known to cause
26 reproductive toxicity is 0.5 micrograms per day. (Cal. Code Regs., tit. 27, § 25805.) The No
27 Significant Risk Level for lead as a carcinogen is 15 micrograms per day. (Cal. Code Regs., tit.
28 27, § 25705.)

15. Proposition 65 may be enforced by any person in the public interest who provides

1 notice sixty days before filing suit to both the violator and designated law enforcement officials.
2 The failure of law enforcement officials to file a timely complaint enables a citizen suit to be filed
3 pursuant to Health & Safety Code section 25249.7, subdivisions (c) and (d).

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

10
11 V

12 **STATEMENT OF FACTS**

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

16 18. For many years, RHG has knowingly and intentionally exposed numerous persons to
17 lead, without providing a Proposition 65 warning. Prior to ERC's Notice of Violation, RHG failed
18 to provide a warning on the label of the Covered Products. RHG has at all times relevant hereto
19 been aware that the Covered Products contained lead and that persons using these products have
20 been exposed to the chemical. RHG's website makes extensive representations regarding the purity
21 and safety of the company's products, as well as the steps purportedly taken to ensure these
22 qualities:

- 23 • "Quality Assurance and Quality Control are our top priority at Vital Nutrients."
24 • "Vital Nutrients is widely known in the professional supplement industry as The
25 Leader in Quality Assurance. We don't simply meet the quality regulations set forth by the FDA or
26 other quality programs. We take whatever measures are necessary to ensure true purity, efficacy,
27 and consistency in our supplements. Here are just a few of the ways that we exceed the quality
28 assurance standards."

1 • "At Vital Nutrients, no corners are cut when it comes to quality assurance. We
2 provide comprehensive proof – and fully guarantee – that our products are prepared in accordance
3 with the highest standards of manufacturing practice and laboratory quality assurance."

4 • "Vital Nutrients manufactures its supplements in a clean, strictly controlled facility
5 that we carefully monitor and supervise. We know exactly what goes into all of our products, and
6 more importantly, what does not go into our products. This allows us to produce products that are
7 free of any binders, excipients, and other potential allergy-causing or undesirable additives. Our
8 full-time staff of Quality Assurance and Quality Control personnel monitor our facility to ensure
9 consistent compliance with our comprehensive quality system and the FDA cGMP's."

10 • "To attain laboratory quality assurance (no easy task), we audit and verify each of
11 our independent laboratories to ensure that they follow scientifically valid analytical methods and
12 ethical lab practices. We also research the scientific validity and reliability of laboratory test
13 methods. As a result, only laboratories that use proper reference standards or scientifically valid
14 testing methods are allowed to test our products. Our goal is maximum clinical effectiveness
15 through proven quality."

16 • "There are two keys to producing consistent clinical benefit and value: excellent raw
17 materials and finished product quality. That's why we have assembled a team of qualified health
18 professionals to formulate our products, and use only bona fide research – including published
19 human and/or animal-based studies – to test them."

20 • "Vital Nutrients exclusively uses ethical, U.S., certified third party labs to test every
21 batch of raw material and finished product."

22 • "At Vital Nutrients we test every lot of raw material and finished product for
23 identity, potency, and a full range of contaminants. Since we have seen quality issues in isolated lots
24 from our most trusted suppliers, we know that the skip lot testing practices employed by our
25 manufacturers and accepted by the FDA are not infallible. At Vital Nutrients we never test on a
26 'once a year,' 'biannual,' or 'as needed' basis."

27 • "All botanical products are tested for presence of lead, mercury, cadmium, and
28 arsenic. Minerals and other raw materials prone to toxic metal contamination are tested for lead."

1 Given the company's exacting formulation and production methods, and the extensive
2 testing conducted on both raw ingredients and finished products, RHG has undoubtedly been aware
3 of the presence of lead in the Covered Products. Nevertheless, the company's website represents to
4 the public that's its products are completely pure and safe. RHG has been aware of the lead in the
5 Covered Products and has failed to disclose the presence of this chemical to the public, who
6 undoubtedly believed they have been ingesting totally healthy and pure products pursuant to the
7 company's statements.

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

12 **FIRST CAUSE OF ACTION**

13 **(Violation of Section 25249.6 of the Health and Safety Code, Failure to Provide Clear** 14 **and Reasonable Warning under Proposition 65)**

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

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

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

24 **SECOND CAUSE OF ACTION**

25 **(Declaratory Relief)**

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

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

5
6 **VI**

7 **PRAYER**

8 WHEREFORE ERC prays for relief as follows:

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

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

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

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

21 5. For costs of suit herein; and

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

23 Dated: January 28, 2014

24
25 By .



26
27 Michael Freund
28 Ryan Hoffman
Attorneys for Environmental Research Center

LAW OFFICE OF
KAREN A. EVANS
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San Diego, CA 92116
Tel: (619) 640-8100
E-Mail: kaevans.erc@gmail.com

September 13, 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 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 the "Violator") is:

RHG & Company, Inc. dba Vital Nutrients

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:

Vital Nutrients Berberine 200mg - Lead
Vital Nutrients Blood Sugar Support - Lead
Vital Nutrients Energy Plus - Lead
Vital Nutrients Adrenal Support - Lead
Vital Nutrients Astragalus Root Extract 300mg - Lead
Vital Nutrients BCQ - Lead
Vital Nutrients Vital Kids Berry Well Immune Support - Lead
Vital Nutrients GI Repair Powder - Lead
Vital Nutrients Calm Aide with Sensoril - Lead
Vital Nutrients Vital Clear - Lead
Vital Nutrients Rhodiola Rosea 3% 200 mg - Lead
Vital Nutrients Osteo-Nutrients II (with Vitamin K2-7) - Lead
Vital Nutrients Reishi Mushroom 500mg - Lead

Exhibit A

Vital Nutrients Herbal Biotic - Lead
Vital Nutrients Goldenseal Plus - Lead
Vital Nutrients Menopause Support - Lead
Vital Nutrients Immune Support - Lead
Vital Nutrients Milk Thistle Extract 250mg - Lead
Vital Nutrients ViraCon - Lead
Vital Nutrients Saw Palmetto Pygeum Nettle Root - 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.

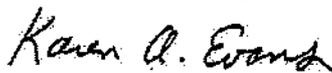
Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to these chemicals has been and continues to be through ingestion, but may have also occurred 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 September 13, 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.

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,



Karen A. Evans

Attachments

- Certificate of Merit
- Certificate of Service
- OEHHA Summary (to RHG & Company, Inc. dba Vital Nutrients 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 RHG & Company, Inc. dba Vital Nutrients

I, Karen A. Evans, 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: September 13, 2013

Karen A. Evans

Karen A. Evans

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 September 13, 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 U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President
RHG & Company, Inc.
dba Vital Nutrients
45 Kenneth Dooley Drive
Middletown, CT 06457

Cranmore Fitzgerald & Meaney, LLC
(RHG & Company, Inc.'s Registered
Agent for Service of Process)
49 Wethersfield Avenue
Hartford, CT 06114

On September 13, 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 September 13, 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 September 13, 2013, in Fort Oglethorpe, Georgia.



Tiffany Caphart

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

September 13, 2013

Page 5

Service List

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

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District Attorney, Amador County
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Woodland, CA 95695

District Attorney, Yuba County
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Marysville, CA 95901

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Los Angeles, CA 90012

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San Diego, CA 92101

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San Francisco, CA 94102

San Jose City Attorney's Office
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16th Floor
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