

State of California - Department of Justice - Attorney General's Office - Proposition 65 Enforcement Reporting

Attention: Prop 65 Coordinator, 1515 Clay Street, Suite 2000, Oakland, CA 94612

FORM JUS 1500  
(03-01)

PRIVATE ENFORCEMENT FILING - Health and Safety Code section 25249.7(e) and (f)

**REPORT OF CIVIL COMPLAINT FILING**

Please print or type required information  Original Filing  Supplemental Filing  Corrected Filing

PARTIES TO THE ACTION	PLAINTIFF(S) <b>ENVIRONMENTAL RESEARCH CENTER, a non-profit California corporation,</b>	
	DEFENDANT(S) <b>AL GLOBAL CORPORATION, a California Corporation; YOUNGEVITY INTERNATIONAL, INC., a Delaware Corporation; AL INTERNATIONAL, INC., WHICH WILL DO BUSINESS IN CALIFORNIA AS YOUNGEVITY, a Delaware Corporation; AL INTERNATIONAL, INC. dba YOUNGEVITY, a Delaware Corporation; AL INTERNATIONAL, INC., a California Corporation,</b>	
CASE INFO	COURT DOCKET NUMBER <b>RG13700552</b>	COURT NAME <b>Alameda</b>
	SHORT CASE NAME	
REPORT INFO	TYPE OF CLAIM (Check All That Apply) <input type="checkbox"/> Propostion 65 Unlawful Discharge <input checked="" type="checkbox"/> Proposition 65 Failure to Warn <input type="checkbox"/> B&P Code section 17200 <input checked="" type="checkbox"/> Other <u>Preliminary/Permanent Injunction; Attorney Fees</u>	RELIEF SOUGHT (Check All That Apply) <input checked="" type="checkbox"/> Warning <input type="checkbox"/> Discharge Ban <input checked="" type="checkbox"/> Civil Penalty For Internal Use Only
	<b>COPY OF COMPLAINT MUST BE ATTACHED</b>	
FILER INFO	NAME OF CONTACT <b>Richard Drury / Christina Caro</b>	
	ORGANIZATION <b>Lozeau Drury LLP</b>	TELEPHONE NUMBER ( )
	ADDRESS <b>410 12th Street, Suite 250</b>	FAX NUMBER ( )
	CITY                                      STATE      ZIP <b>Oakland, CA 94607</b>	E-MAIL ADDRESS <b>richard@lozeaudrury.com</b>

**FILING INSTRUCTIONS:** This form can be completed online and printed. If electronic filing is not available, mail the completed form with a copy of the complaint to the attention of the Prop 65 Coordinator at the address shown above. If you need additional space to complete this form please use an attachment.

1 RICHARD DRURY (CBN 163559)  
2 CHRISTINA M. CARO (CBN 250797)  
3 LOZEAU|DRURY LLP  
4 410 12<sup>th</sup> Street, Suite 250  
Oakland, CA 94607  
Ph: 510-836-4200  
Fax: 510-836-4205  
Email: richard@lozeaudrury.com

**ENDORSED  
FILED  
ALAMEDA COUNTY**

FEB 21 2014

CLERK OF THE SUPERIOR COURT  
**MARGARET J. DOWNIE**  
Deputy

5 Attorneys for Plaintiff  
6 ENVIRONMENTAL RESEARCH CENTER

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; YOUNGEVITY )  
16 INTERNATIONAL, INC., a Delaware )  
17 Corporation; AL INTERNATIONAL, INC., )  
18 WHICH WILL DO BUSINESS IN )  
19 CALIFORNIA AS YOUNGEVITY, a )  
20 Delaware Corporation; AL )  
INTERNATIONAL, INC. dba )  
YOUNGEVITY, a Delaware Corporation; AL )  
INTERNATIONAL, INC., a California )  
Corporation, )

21 Defendant. )

Case No. RG13700552

**FIRST AMENDED COMPLAINT FOR  
INJUNCTIVE RELIEF AND CIVIL  
PENALTIES**

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

Provisionally Assigned to Complex Litigation  
Hon. George C. Hernandez, Jr.

Hearing: None Requested  
Dept: 17

Case Filed: October 24, 2013

22  
23 PLAINTIFF Environmental Research Center brings this action in the interests of the  
24 general public and, on information and belief, hereby alleges:

25 **INTRODUCTION**

26 1. This action seeks to remedy DEFENDANTS' continuing failure to warn

1 consumers in California that they are being exposed to lead and/or lead compounds, substances  
2 known to the State of California to cause cancer, birth defects and other reproductive harm.

3 2. Defendant AL GLOBAL CORPORATION (“AL GLOBAL”) manufactures,  
4 packages, distributes, markets, and/or sells in California certain products containing lead and/or  
5 lead compounds (the “AL GLOBAL PRODUCTS”) including:

- 6 **Healing The Globe Scarlar Enhanced Detoxal 21**
- 7 **Livinity Livin Slim Plus**
- 8 **Livinity Stress-ese Plus**
- 9 **Youngevity R-Garden Milk Thistle Formula**
- 10 **R-Garden Inc. Memory Formula**
- 11 **Youngevity R-Garden Brown Seaweed Extract Formula**
- 12 **R-Garden Inc. Herbal Blends Female Hormone System**
- 13 **Youngevity R-Garden Green Energy Plus**
- 14 **R-Garden Inc. Herbal Blends Eyes System**
- 15 **R-Garden Inc. Herbal Blends Immune Fungi System**
- 16 **R-Garden Inc. Herbal Blends Liver Gallbladder System**
- 17 **R-Garden Inc. Bowel Toner**
- 18 **R-Garden Inc. Herbal Blends Thyroid System**
- 19 **R-Garden Inc. Herbal Blends Respiratory Lung**
- 20 **R-Garden Inc. Sun Energy**
- 21 **Youngevity Premium Women's Hormonal Balancer**
- 22 **Ancient Legacy Ocean's Gold**
- 23 **Scalar Core International Scalar Enhanced Colon Activator**
- 24 **Youngevity A J.D. Wallach Corporation D'Tox FX**
- 25 **Healing The Globe Reshape America Ameri Trim**
- 26 **Youngevity Ultimate Youth**
- Youngevity Slender FX Meal Replacement Shake Vanilla**
- Youngevity Slender FX Meal Replacement Shake Chocolate**
- True2life Fast Food Chocolate**
- True2life Fast Food Vanilla**
- True2life True Cleanse**
- Youngevity A J.D. Wallach Corporation Majestic Earth –**  
**Ultimate Osteo-FX**
- Youngevity Beyond Osteo-fx Tropical Vanilla Flavor**
- Pure3x Designer Beverage Club tazza di vita**
- Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor**

3. Defendants YOUNGEVITY INTERNATIONAL, INC. (“YOUNGEVITY I”),  
AL INTERNATIONAL, INC., WHICH WILL DO BUSINESS IN CALIFORNIA AS  
YOUNGEVITY (“YOUNGEVITY II”), AL INTERNATIONAL, INC. dba YOUNGEVITY

1 (“YOUNGEVITY III”), and AL INTERNATIONAL, INC. (“AL INTERNATIONAL”)  
2 manufacture, package, distribute, market, and/or sell in California certain products containing  
3 lead and/or lead compounds (“YOUNGEVITY PRODUCTS” or collectively with AL  
4 GLOBAL PRODUCTS as the “PRODUCTS”) including:

5 **Healing The Globe Scarlar Enhanced Detoxal 21**  
6 **Livinity Livin Slim Plus**  
7 **Livinity Stress-ese Plus**  
8 **Youngevity R-Garden Milk Thistle Formula**  
9 **R-Garden Inc. Memory Formula**  
10 **Youngevity R-Garden Brown Seaweed Extract Formula**  
11 **R-Garden Inc. Herbal Blends Female Hormone System**  
12 **Youngevity R-Garden Green Energy Plus**  
13 **R-Garden Inc. Herbal Blends Eyes System**  
14 **R-Garden Inc. Herbal Blends Immune Fungi System**  
15 **R-Garden Inc. Herbal Blends Liver Gallbladder System**  
16 **R-Garden Inc. Bowel Toner**  
17 **R-Garden Inc. Herbal Blends Thyroid System**  
18 **R-Garden Inc. Sun Energy**  
19 **Youngevity Premium Women’s Hormonal Balancer**  
20 **Ancient Legacy Ocean’s Gold**  
21 **Scalar Core International Scalar Enhanced Colon Activator**  
22 **Youngevity A J.D. Wallach Corporation D’Tox FX**  
23 **Healing The Globe Reshape America Ameri Trim**  
24 **Youngevity Ultimate Youth**  
25 **Youngevity Slender FX Meal Replacement Shake Vanilla**  
26 **Youngevity Slender FX Meal Replacement Shake Chocolate**  
**True2Life Fast Food Chocolate**  
**True2Life Fast Food Vanilla**  
**True2Life True Cleanse**  
**Youngevity A J.D. Wallach Corporation Majestic Earth Ultimate**  
**Osteo-FX**  
**Youngevity Beyond Osteo-fx Tropical Vanilla Flavor**  
**R-Garden Inc. Herbal Blends Respiratory Lung**  
**Pure3x Designer Beverage Club tazza di vita**  
**Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor**

4. 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

---

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

1 reproductive harm.

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

7 6. DEFENDANTS’ continued manufacturing, packaging, distributing, marketing  
8 and/or sales of the PRODUCTS without the required health hazard warnings, causes  
9 individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICALS  
10 that violate Proposition 65.

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

23 8. In addition to injunctive relief, PLAINTIFF seeks an assessment of civil  
24 penalties in excess of \$24.5 million to remedy DEFENDANTS’ failure to provide clear and  
25 reasonable warnings regarding exposures to the LISTED CHEMICALS.  
26

1 **JURISDICTION AND VENUE**

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

6 10. This Court has jurisdiction over DEFENDANTS because, based on information  
7 and belief, DEFENDANTS are businesses having sufficient minimum contacts with California,  
8 or otherwise intentionally availing themselves of the California market through the distribution  
9 and sale of the PRODUCTS in the State of California, to render the exercise of jurisdiction  
10 over them by the California courts consistent with traditional notions of fair play and  
11 substantial justice.

12 11. Venue in this action is proper in the Alameda Superior Court because the  
13 DEFENDANTS have violated California law in the County of Alameda.

14 **PARTIES**

15 12. PLAINTIFF Environmental Research Center ("PLAINTIFF" or "ERC") is a  
16 corporation organized under California's Corporation Law. ERC is dedicated to, among other  
17 causes, reducing the use and misuse of hazardous and toxic substances, consumer protection,  
18 worker safety and corporate responsibility.

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

21 14. Defendant AL GLOBAL CORPORATION is a corporation organized under  
22 California's Corporation Law and is a person doing business within the meaning of H&S Code  
23 §25249.11 with an office at 2400 Boswell Road, Chula Vista, CA 91914. AL GLOBAL  
24 Manufactures, packages, DISTRIBUTES, markets and/or sells the AL GLOBAL PRODUCTS  
25 for sale or use in California and in Alameda County.

1           15. Defendant YOUNGEVITY INTERNATIONAL, INC. (“YOUNGEVITY I”) is  
2 a corporation organized under Delaware’s Corporation Law and is a person doing business  
3 within the meaning of H&S Code §25249.11 with an office at 2400 Boswell Road, Chula  
4 Vista, CA 91914. YOUNGEVITY I manufactures, packages, DISTRIBUTES, markets and/or  
5 sells the YOUNGEVITY PRODUCTS for sale or use in California and in Alameda County.

6           16. Defendant AL INTERNATIONAL, INC., WHICH WILL DO BUSINESS IN  
7 CALIFORNIA AS YOUNGEVITY (“YOUNGEVITY II”) is a corporation organized under  
8 Delaware’s Corporation Law and is a person doing business within the meaning of H&S Code  
9 §25249.11 with an office at 2400 Boswell Road, Chula Vista, CA 91914. YOUNGEVITY II  
10 manufactures, packages, DISTRIBUTES, markets and/or sells the YOUNGEVITY  
11 PRODUCTS for sale or use in California and in Alameda County.

12           17. Defendant AL INTERNATIONAL, INC. dba YOUNGEVITY  
13 (“YOUNGEVITY III”) is a corporation organized under Delaware’s Corporation Law and is a  
14 person doing business within the meaning of H&S Code §25249.11 with an office at 2400  
15 Boswell Road, Chula Vista, CA 91914. YOUNGEVITY III manufactures, packages,  
16 DISTRIBUTES, markets and/or sells the YOUNGEVITY PRODUCTS for sale or use in  
17 California and in Alameda County.

18           18. Defendant AL INTERNATIONAL, INC. (“AL INTERNATIONAL”) is a  
19 corporation organized under California’s Corporation Law and is a person doing business  
20 within the meaning of H&S Code §25249.11 with an office at 2400 Boswell Road, Chula  
21 Vista, CA 91914. AL INTERNATIONAL manufactures, packages, DISTRIBUTES, markets  
22 and/or sells the YOUNGEVITY PRODUCTS for sale or use in California and in Alameda  
23 County.

### **STATUTORY BACKGROUND**

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

1           20.     To effect this goal, Proposition 65 requires that individuals be provided with a  
2 "clear and reasonable warning" before being exposed to substances listed by the State of  
3 California as causing cancer or reproductive toxicity. Health and Safety (“H&S”) Code  
4 §25249.6 states, in pertinent part:

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

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

### 14   **FACTUAL BACKGROUND**

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

20           23.     On October 1, 1992, the State of California officially listed the chemicals lead  
21 and lead compounds as chemicals known to cause cancer. Lead and lead compounds became  
22 subject to the warning requirement one year later and were therefore subject to the "clear and  
23 reasonable" warning requirements of Proposition 65 beginning on October 1, 1993. 27 CCR §  
24 25000, *et seq.*; H&S Code §25249.6, *et seq.* Due to the high toxicity of lead, the maximum  
25 allowable dose level for lead is 0.5 ug/day (micrograms a day) for reproductive toxicity.

26           24.     To test DEFENDANTS’ PRODUCTS for lead, PLAINTIFF hired a well-  
respected and accredited testing laboratory that designed the testing protocol used and



1 approved by the California Attorney General years ago for testing heavy metals. The testing  
2 results undertaken by PLAINTIFF of DEFENDANTS' PRODUCTS show that the  
3 PRODUCTS tested were in violation of the Proposition 65 0.5 ug/day "safe harbor" daily dose  
4 limit. Very significant is the fact that people are being exposed to lead through ingestion as  
5 opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of  
6 lead produces much higher exposure levels and health risks than dermal exposure to this  
7 chemical.

8 25. At all times relevant to this action, DEFENDANTS therefore has knowingly  
9 and intentionally exposed the users and/or handlers of the PRODUCTS to LISTED  
10 CHEMICALS without first giving a clear and reasonable warning to such individuals.

11 26. The AL GLOBAL PRODUCTS have been sold by AL GLOBAL for use  
12 in California since at least May 17, 2010, with the exception of three AL GLOBAL  
13 products - Youngevity Beyond Osteo-fx Tropical Vanilla Flavor, Pure3x Designer  
14 Beverage Club tazza di vita, and Youngevity Beyond Osteo-fx Powder Tropical Vanilla  
15 Flavor (collectively, "ADDITIONAL PRODUCTS"), which ADDITIONAL  
16 PRODUCTS have been sold by AL GLOBAL for use in California since at least  
17 September 13, 2010. The AL GLOBAL PRODUCTS continue to be distributed and sold  
18 in California without the requisite warning information.

19 27. On May 17, 2013, ERC served AL GLOBAL and each of the appropriate public  
20 enforcement agencies with a document entitled "Notice of Violations of California Health &  
21 Safety Code Section 25249.5 " that provided AL GLOBAL and the public enforcement  
22 agencies with notice that AL GLOBAL was in violation of Proposition 65 for failing to warn  
23 purchasers and individuals using the AL GLOBAL PRODUCTS (not including the  
24 ADDITIONAL PRODUCTS) that the use of the AL GLOBAL PRODUCTS exposes them to  
25 lead, a chemical known to the State of California to cause cancer and/or reproductive toxicity  
26 ("**Prop. 65 Notice**") (a copy of the 60-Day Notice is attached hereto as **Exhibit A**).

1           28.     On September 13, 2013, ERC served AL GLOBAL and each of the appropriate  
2 public enforcement agencies with a document entitled "Notice of Violations of California  
3 Health & Safety Code Section 25249.5 " that provided AL GLOBAL and the public  
4 enforcement agencies with notice that AL GLOBAL was in violation of Proposition 65 for  
5 failing to warn purchasers and individuals using the ADDITIONAL PRODUCTS that the use  
6 of the ADDITIONAL PRODUCTS exposes them to lead, a chemical known to the State of  
7 California to cause cancer and/or reproductive toxicity (“**Prop. 65 Notice**”) (a copy of the 60-  
8 Day Notice is attached hereto as **Exhibit B**).

9           29.     The YOUNGEVITY PRODUCTS have been sold by YOUNGEVITY I,  
10 YOUNGEVITY II, YOUNGEVITY III, and AL INTERNATIONAL for use in  
11 California since at least October 18, 2010. The YOUNGEVITY PRODUCTS continue to  
12 be distributed and sold in California without the requisite warning information.

13           30.     On October 18, 2013, ERC served YOUNGEVITY I, YOUNGEVITY II,  
14 YOUNGEVITY III, and AL INTERNATIONAL and each of the appropriate public  
15 enforcement agencies with a document entitled "Notice of Violations of California Health &  
16 Safety Code Section 25249.5 " that provided YOUNGEVITY I, YOUNGEVITY II,  
17 YOUNGEVITY III, and AL INTERNATIONAL and the public enforcement agencies with  
18 notice that YOUNGEVITY I, YOUNGEVITY II, YOUNGEVITY III, and AL  
19 INTERNATIONAL were in violation of Proposition 65 for failing to warn purchasers and  
20 individuals using the YOUNGEVITY PRODUCTS that the use of the YOUNGEVITY  
21 PRODUCTS exposes them to lead, a chemical known to the State of California to cause cancer  
22 and/or reproductive toxicity (“**Prop. 65 Notice**”) (a copy of the 60-Day Notice is attached  
23 hereto as **Exhibit C**).

24           31.     As a proximate result of acts by DEFENDANTS, as persons in the course of  
25 doing business within the meaning of Health & Safety Code §25249.11, individuals throughout  
26 the State of California, including in the County of Alameda, have been exposed to the LISTED

1 CHEMICALS without clear and reasonable warning. The individuals subject to the violative  
2 exposures include normal and foreseeable users of the PRODUCTS, as well as all other  
3 persons exposed to the PRODUCTS.

4 **FIRST CAUSE OF ACTION**

5 **Injunctive Relief for Violations of Health and Safety Code § 25249.5, et seq. concerning**  
6 **the PRODUCTS described in the May 17, 2013, September 13, 2013, and**  
7 **October 18, 2013 Prop. 65 NOTICES OF VIOLATION**  
8 **Against ALL DEFENDANTS**

9 32. PLAINTIFF realleges and incorporates by reference all preceding paragraphs as  
10 if specifically set forth herein

11 33. On May 17, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65  
12 violations to the requisite public enforcement agencies, and to AL GLOBAL (“Notice 1”)  
13 attached hereto as Exhibit A. Notice I was issued pursuant to, and in compliance with, the  
14 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding  
15 the notice of the violations to be given to certain public enforcement agencies and to the  
16 violator. The notice given included, *inter alia*, the following information: the name, address,  
17 and telephone number of the noticing individual; the name of the alleged violator; the statute  
18 violated; the approximate time period during which violations occurred; and descriptions of the  
19 violations, including the chemicals involved, the routes of toxic exposure, and the specific  
20 product or type of product causing the violations, and was issued as follows:

- 21 a. AL GLOBAL was provided a copy of Notice I by Certified Mail.
- 22 b. AL GLOBAL 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 Notice I via  
online submission.
- d. The California Attorney General was provided with a Certificate of Merit

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

7 34. On September 13, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65  
8 violations to the requisite public enforcement agencies, and to AL GLOBAL (“Notice II”)  
9 attached hereto as Exhibit B. Notice II was issued pursuant to, and in compliance with, the  
10 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding  
11 the notice of the violations to be given to certain public enforcement agencies and to the  
12 violator. The notice given included, *inter alia*, the following information: the name, address,  
13 and telephone number of the noticing individual; the name of the alleged violator; the statute  
14 violated; the approximate time period during which violations occurred; and descriptions of the  
15 violations, including the chemicals involved, the routes of toxic exposure, and the specific  
16 product or type of product causing the violations, and was issued as follows:

- 17 e. AL GLOBAL was provided a copy of Notice II by Certified Mail.
- 18 f. AL GLOBAL was provided a copy of a document entitled "The Safe  
19 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A  
20 Summary," which is also known as Appendix A to Title 27 of CCR  
21 §25903.
- 22 g. The California Attorney General was provided a copy of Notice II via  
23 online submission.
- 24 h. The California Attorney General was provided with a Certificate of Merit  
25 by the attorney for the noticing party, stating that there is a reasonable  
26 and meritorious case for this action, and attaching factual information

1 sufficient to establish a basis for the certificate, including the identity of  
2 the persons consulted with and relied on by the certifier, and the facts,  
3 studies, or other data reviewed by those persons, pursuant to H&S Code  
4 §25249.7(h) (2).

5 35. On October 18, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65  
6 violations to the requisite public enforcement agencies, and to YOUNGEVITY I,  
7 YOUNGEVITY II, YOUNGEVITY III, and AL INTERNATIONAL (“Notice III”) attached  
8 hereto as Exhibit C. Notice III was issued pursuant to, and in compliance with, the  
9 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding  
10 the notice of the violations to be given to certain public enforcement agencies and to the  
11 violator. The notice given included, *inter alia*, the following information: the name, address,  
12 and telephone number of the noticing individual; the name of the alleged violator; the statute  
13 violated; the approximate time period during which violations occurred; and descriptions of the  
14 violations, including the chemicals involved, the routes of toxic exposure, and the specific  
15 product or type of product causing the violations, and was issued as follows:

16 i. YOUNGEVITY I, YOUNGEVITY II, YOUNGEVITY III, and AL  
17 INTERNATIONAL were provided a copy of Notice III by Certified  
18 Mail.

19 j. YOUNGEVITY I, YOUNGEVITY II, YOUNGEVITY III, and AL  
20 INTERNATIONAL were provided a copy of a document entitled "The  
21 Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition  
22 65): A Summary," which is also known as Appendix A to Title 27 of  
23 CCR §25903.

24 k. The California Attorney General was provided a copy of Notice III via  
25 online submission.

26 l. The California Attorney General was provided with a Certificate of Merit

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

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

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

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

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

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

26 Wherefore, PLAINTIFF prays judgment against DEFENDANTS, as set forth hereafter.



1 participating with DEFENDANTS, from distributing or selling the PRODUCTS in California  
2 without first providing a clear and reasonable warning, within the meaning of Proposition 65,  
3 that the users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICALS.

4 B. An injunctive order, pursuant to H&S Code §25249.7(b), compelling  
5 DEFENDANTS to identify and locate each individual who has purchased the PRODUCTS  
6 identified in Notice I since May 17, 2012, the PRODUCTS identified in Notice II since  
7 September 13, 2012, and the PRODUCTS identified in Notice III since October 18, 2012, and  
8 to provide a warning to such person that the use of the PRODUCTS will expose the user to  
9 chemicals known to cause cancer, birth defects, and other reproductive harm.

10 C. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),  
11 against DEFENDANTS in the amount of \$2,500 per day for each violation of Proposition 65,  
12 in an amount in excess of \$24.5 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  
18 DATED: February 21, 2014

LOZEAU | DRURY LLP

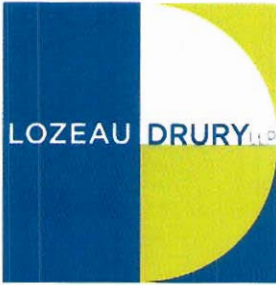
19  
20  
21 

22 Richard T. Drury  
23 Christina M. Caro  
24 Attorneys for Plaintiff  
25 Environmental Research Center  
26



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**Exhibit A**



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.

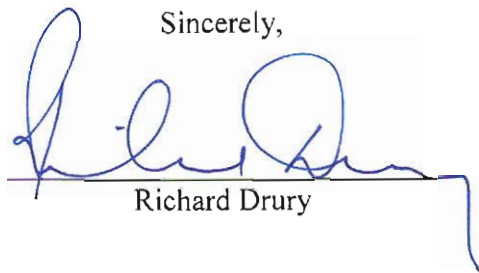
This letter is a notice to the Violator and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violator currently known to ERC from the information now available. ERC may continue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

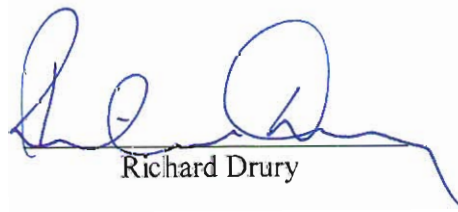
**CERTIFICATE OF MERIT**

**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 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> 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	

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**Exhibit B**





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 chemicals in those products identified as exceeding allowable levels are:

**Youngevity Beyond Osteo-fx Tropical Vanilla Flavor - Lead**  
**Pure3x Designer Beverage Club tazza di vita - Lead**  
**Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor - 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.

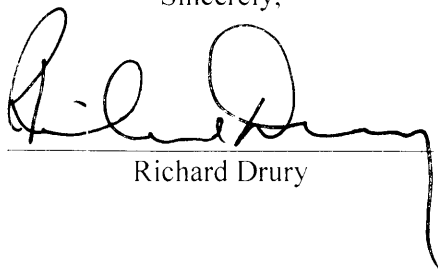
This letter is a notice to the Violator and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violator currently known to ERC from the information now available. ERC may continue 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 September 13, 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 chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and 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,

A handwritten signature in black ink, appearing to read "Richard Drury", written over a horizontal line. The signature is cursive and somewhat stylized.

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)

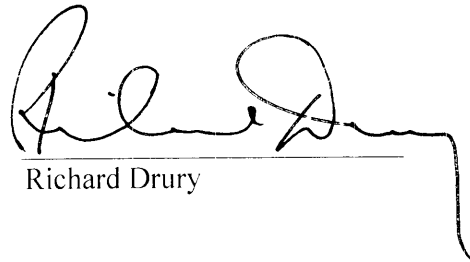
**CERTIFICATE OF MERIT**

**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: September 13, 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 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  
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 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 Capehart

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

September 13, 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 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 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> 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	

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**Exhibit C**



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  
Youngevity International, Inc.  
2400 Boswell Road  
Chula Vista, CA 91914

Current CEO or President  
AL International, Inc.  
2400 Boswell Road  
Chula Vista, CA 91914

Current CEO or President  
AL International, Inc. dba Youngevity  
2400 Boswell Road  
Chula Vista, CA 91914

Current CEO or President  
AL International, Inc.  
2525 E Lincoln Avenue  
Anaheim, CA 92806

CT Corporation System  
(AL International, Inc. dba Youngevity's  
Registered Agent for Service of Process)  
818 West Seventh Street  
Los Angeles, CA 90017

Albraa Almubiad  
(AL International, Inc.'s  
Registered Agent for Service of Process)  
2525 East Lincoln Avenue  
Anaheim, CA 92806

Corporation Trust Company  
(Youngevity International, Inc.'s  
Registered Agent for Service of Process)  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**VIA ONLINE SUBMISSION**

Office of the California Attorney General

**VIA PRIORITY MAIL**

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



**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 names of the Companies covered by this notice that violated Proposition 65 (hereinafter the “Violators”) are:

**AL International, Inc.  
AL International, Inc. dba Youngevity  
Youngevity International, Inc.**

The products that are the subject of this notice and the chemicals 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. 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**  
**Youngevity A J.D. Wallach Corporation Majestic Earth Ultimate Osteo-FX – Lead**  
**Youngevity Beyond Osteo-fx Tropical Vanilla Flavor – Lead**  
**R-Garden Inc. Herbal Blends Respiratory Lung - Lead**  
**Pure3x Designer Beverage Club tazza di vita - Lead**  
**Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor - 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 each of the Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators 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 each of the Violators.

Each of the Violators 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. Each of the Violators violated Proposition 65 because they 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 October 18, 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 each of the Violators agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; 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

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

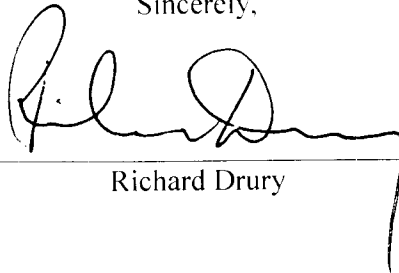
October 18, 2013

Page 4

both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and 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,

A handwritten signature in black ink, appearing to read 'Richard Drury', is written over a horizontal line. The signature is fluid and cursive, with a long, sweeping tail that extends to the right and then curves downwards.

Richard Drury

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to AL International, Inc., AL International, Inc. dba Youngevity, Youngevity International, Inc., and their Registered Agents for Service of Process only)

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

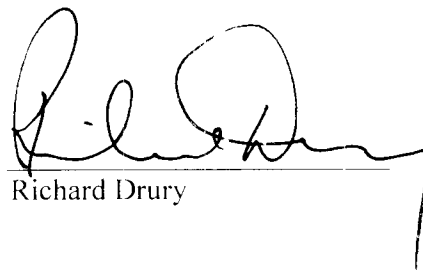
**CERTIFICATE OF MERIT**

**Re: Environmental Research Center's Notice of Proposition 65 Violations by  
AL International, Inc., AL International, Inc. dba Youngevity, and  
Youngevity International, Inc.**

I, Richard Drury, declare:

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

Dated: October 18, 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 October 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 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  
Youngevity International, Inc.  
2400 Boswell Road  
Chula Vista, CA 91914

CT Corporation System  
(AL International, Inc. dba Youngevity’s  
Registered Agent for Service of Process)  
818 West Seventh Street  
Los Angeles, CA 90017

Current CEO or President  
AL International, Inc.  
2400 Boswell Road  
Chula Vista, CA 91914

Albraa Almubiad  
(AL International, Inc.’s  
Registered Agent for Service of Process)  
2525 East Lincoln Avenue  
Anaheim, CA 92806

Current CEO or President  
AL International, Inc. dba Youngevity  
2400 Boswell Road  
Chula Vista, CA 91914

Corporation Trust Company  
(Youngevity International, Inc.’s  
Registered Agent for Service of Process)

Current CEO or President  
AL International, Inc.  
2525 E Lincoln Avenue  
Anaheim, CA 92806

Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

On October 18, 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

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

October 18, 2013

Page 7

On October 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 with the U.S. Postal Service with the postage fully prepaid for delivery by First Class Mail.

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

A handwritten signature in black ink, appearing to read "Tiffany Capehart", written over a horizontal line.

Tiffany Capehart

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

October 18, 2013

Page 8

**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 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 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> 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	