1 2 3 4 5 6 7	RICHARD DRURY (CBN 163559) DOUGLAS J. CHERMAK (CBN 233382) LOZEAU   DRURY LLP 410 12 <sup>th</sup> Street, Suite 250 Oakland, CA 94607 Ph: 510-836-4200 Fax: 510-836-4205 Email: richard@lozeaudrury.com Attorneys for Plaintiff ENVIRONMENTAL RESEARCH CENTER	ENDORSED FILED ALAMEDA COUNTY JUL - 1 2014 CLERK OF AME SUMERING COURT By	
8			
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF ALAMEDA		
10		LAMEDA	
11	ENVIRONMENTAL RESEARCH CENTER, )	Case NRG14731268	
12	a non-profit California corporation,		
13	Plaintiff,	COMPLAINT FOR INJUNCTIVE RELIEF AND CIVIL PENALTIES	
14	v. )	Health & Safety Code §25249.5, et seq.	
15 16	CENTURY SYSTEMS.INC, a Georgia ) Corporation, )		
10	Defendant.		
17	))		
10			
20	Plaintiff Environmental Research Center brings this action in the interests of the		
20	general public and, on information and belief, hereby alleges:		
21	INTRODUCTION		
22	1. This action seeks to remedy the continuing failure of Defendant Century		
23	Systems, Inc., to warn consumers in California that they are being exposed to lead, a substance		
24	known to the State of California to cause cancer, birth defects, and other reproductive harm.		
26	Defendant manufactures, packages, distributes, markets, and/or sells in California certain		
20	products containing lead (the "PRODUCTS"):		

•

•

•

2.

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

State<sup>1</sup> of California to cause cancer, birth defects, and other reproductive harm. 3. The use and/or handling of the PRODUCTS causes exposures to the LISTED CHEMICAL at levels requiring a "clear and reasonable warning" under California's Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code ("H&S Code") §25249.5, et seq. (also known as "Proposition 65"). Defendant has failed to provide the health hazard warnings required by Proposition 65.

**Century Systems Vitarol with Years + Male Longevity** 

Century Systems The Cleaner 7 Day Men's Formula

**Century Systems Vitarol with Multi-Thin Female Energy** 

**Century Systems The Cleaner 7 Day Women's Formula Century Systems The Cleaner 14 Day Women's Formula** 

**Century Systems The Cleaner 14 Day Men's Formula** 

Lead (hereinafter, the "LISTED CHEMICAL") is a substance known to the

**Century Systems Male Drive Maximum Strength** 

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

5. Plaintiff seeks injunctive relief enjoining Defendant from the continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in California without provision of clear and reasonable warnings regarding the risks of cancer, birth defects, and other reproductive harm posed by exposure to the LISTED CHEMICAL through the use and/or handling of the PRODUCTS. Plaintiff seeks an injunctive order compelling Defendant to bring its business practices into compliance with Proposition 65 by providing a clear and reasonable warning to each individual who has been and who in the future may be exposed to the LISTED CHEMICAL from the use of the PRODUCTS. Plaintiff

also seeks an order compelling Defendant to identify and locate each individual person who in the past has purchased the PRODUCTS, and to provide to each such purchaser a clear and 2 reasonable warning that the use of the PRODUCTS will cause exposures to the LISTED CHEMICAL.

6. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties in excess of \$7 million to remedy Defendant's failure to provide clear and reasonable warnings regarding exposures to the LISTED CHEMICAL.

## JURISDICTION AND VENUE

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

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

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

### PARTIES

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

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

1	12.	Defendant CENTURY SYSTEMS, INC. ("DEFENDANT") is a
2	corporation organized under California's Corporation Law and is a person doing business	
3	within the meaning of H&S Code §25249.11.	
4	13.	DEFENDANT manufactures, packages, distributes, markets and/or sells the
5	PRODUCTS for sale or use in California and in Alameda County.	
6		STATUTORY BACKGROUND
7	14.	The People of the State of California have declared in Proposition 65 their right
8	"[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other	
9	reproductive harm." (Section 1(b) of Initiative Measure, Proposition 65).	
10	15.	To effect this goal, Proposition 65 requires that individuals be provided with a
11	"clear and reasonable warning" before being exposed to substances listed by the State of	
12	California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent	
13	part:	No person in the course of doing business shall knowingly and intentionally
14 15	expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual	
16 17	16.	Proposition 65 provides that any person "violating or threatening to violate" the
17	statute may be enjoined in a court of competent jurisdiction. (H&S Code §25249.7). The phrase	
10	"threatening to violate" is defined to mean creating "a condition in which there is a substantial	
20	likelihood that a violation will occur." (H&S Code §25249.11(e)). Violators are liable for civil	
20	penalties of up to \$2,500 per day for each violation of the Act. (H&S Code §25249.7.)	
21 22	FACTUAL BACKGROUND	
22	17.	On February 27, 1987, the State of California officially listed the chemical lead
23 24	as a chemical known to cause reproductive toxicity. Lead became subject to the warning	
	requirement one year later and was therefore subject to the "clear and reasonable" warning	
25 26	requirements of Proposition 65 beginning on February 27, 1988. (27 California Code of	
20	Regulations (	"CCR") §25000, et seq.; H&S Code §25249.5, et seq.).

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

19. To test Defendant's PRODUCTS for lead, PLAINTIFF hired a well-respected and accredited testing laboratory that designed the testing protocol used and approved by the California Attorney General years ago for testing heavy metals. The results of testing undertaken by PLAINTIFF of DEFENDANT's PRODUCTS show that the PRODUCTS tested were in violation of the 0.5 ug/day "safe harbor" daily dose limit set forth in Proposition 65's regulations. Very significant is the fact that people are being exposed to lead through ingestion as opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of lead produces much higher exposure levels and health risks than does dermal exposure to this chemical.

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

21. The PRODUCTS have allegedly been sold by DEFENDANT for use in California since at least April 4, 2011. The PRODUCTS continue to be distributed and sold in California without the requisite warning information.

22. On April 4, 2014, ERC served DEFENDANT and each of the appropriate public enforcement agencies with a document entitled "Notice of Violations of California Health & Safety Code Section 25249.5" that provided DEFENDANT and the public enforcement agencies with notice that DEFENDANT was in violation of Proposition 65 for failing to warn purchasers and individuals using the PRODUCTS that the use of the PRODUCTS exposes them to lead, a chemical known to the State of California to cause cancer and/or reproductive toxicity ("Prop. 65 Notice") (a copy of the 60-Day Notice is attached hereto as **Exhibit A**).

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

FIRST CAUSE OF ACTION

## (Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the PRODUCTS described in the April 4, 2014, Prop. 65 Notice) Against DEFENDANT

25. PLAINTIFF re-alleges and incorporates by reference Paragraphs 1 through 24, inclusive, as if specifically set forth herein.

26. On April 4, 2014, PLAINTIFF sent a 60-Day Notice of Proposition 65 violations to the requisite public enforcement agencies, and to DEFENDANT ("Notice") attached hereto as Exhibit A. The Notice was issued pursuant to, and in compliance with, the requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding the notice of the violations to be given to certain public enforcement agencies and to the violator. The Notice included, *inter alia*, the following information: the name, address, and telephone number of the noticing individual; the name of the alleged violator; the statute violated; the approximate time period during which violations occurred; and descriptions of the violations, including the chemicals involved, the routes of toxic exposure, and the specific product or type of product causing the violations, and was issued as follows:

 DEFENDANT and the California Attorney General were provided copies of the Notice by Certified Mail. b. DEFENDANT was provided a copy of a document entitled "The Safe
Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
Summary," which is also known as Appendix A to Title 27 of CCR
§25903.

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

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

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

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

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

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

SECOND CAUSE OF ACTION **PRODUCTS described in PLAINTIFF's NOTICE)** Against DEFENDANT 32. 33. 34. THE NEED FOR INJUNCTIVE RELIEF 35. 36. -8-COMPLAINT FOR INJUNCTIVE RELIEF AND CIVIL PENALTIES

# irreparably harm the citizens of the State of California, for which harm they have no plain, speedy, or adequate remedy at law.

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

Continuing commission by DEFENDANT of the acts alleged above will

# (Civil Penalties for Violations of Health and Safety Code § 25249.5, et seq. concerning the

PLAINTIFF re-alleges and incorporates by reference Paragraphs 1 through 31, inclusive, as if specifically set forth herein.

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

By the above-described acts, DEFENDANT is liable, pursuant to H&S Code §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to the LISTED CHEMICAL from the PRODUCTS, in an amount in excess of \$7 million.

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

PLAINTIFF re-alleges and incorporates by this reference Paragraphs 1 through 34, as if set forth below.

By committing the acts alleged in this Complaint, DEFENDANT has caused 23 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence 24 of equitable relief, DEFENDANT will continue to create a substantial risk of irreparable injury 25 26 by continuing to cause consumers to be involuntarily and unwittingly exposed to the LISTED

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

31.

CHEMICAL through the use and/or handling of the PRODUCTS.

# PRAYER FOR RELIEF

Wherefore, PLAINTIFF accordingly prays for the following relief:

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

9 B. an injunctive order, pursuant to H&S Code §25249.7(b), compelling DEFENDANT to identify and locate each individual who has purchased the PRODUCTS since 10 December 13, 2010, and to provide a warning to such person that the use of the PRODUCTS 11 will expose the user to chemicals known to cause cancer, birth defects, and other reproductive 12 13 harm;

C. an assessment of civil penalties pursuant to Health & Safety Code §25249.7(b), against DEFENDANT in the amount of \$2,500 per day for each violation of Proposition 65, in an amount in excess of \$7 million:

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

E.

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

DATED: July 1, 2014

Lozeau | Drury LLP

the

Douglas Chermak Attorney for Plaintiff Environmental Research Center

1

2

3

4

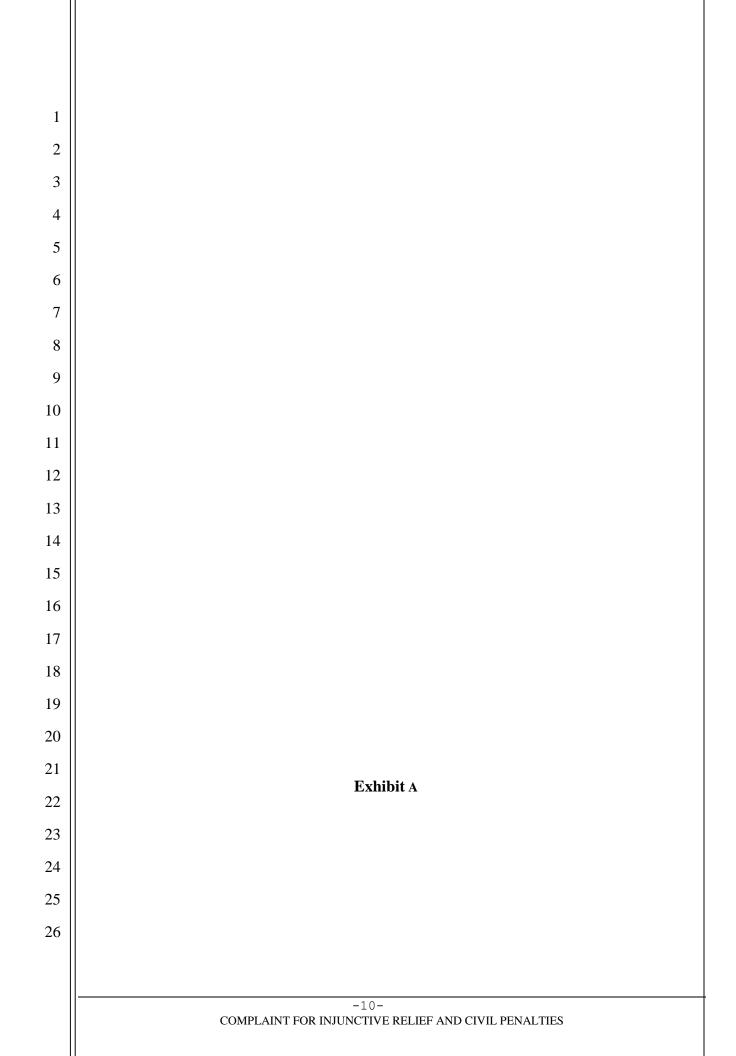
5

6

7

8

14





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 Century Systems, Inc. PO Box 43725 Atlanta, GA 30336

#### VIA PRIORITY MAIL

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

Current CEO or President Century Systems, Inc. 120 Selig Drive SW Atlanta, GA 30336

Nathaniel Bronner Jr. (Century Systems, Inc.'s Registered Agent for Service of Process) 120 Selig Drive SW Atlanta, GA 30336

#### 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:

#### Century Systems, Inc.

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

- a) Century Systems Vitarol with Years + Male Longevity Lead
- b) Century Systems Male Drive Maximum Strength Lead
- c) Century Systems Vitarol with Multi-Thin Female Energy Lead
- d) Century Systems The Cleaner 7 Day Men's Formula Lead
- e) Century Systems The Cleaner 7 Day Women's Formula Lead
- f) Century Systems The Cleaner 14 Day Women's Formula Lead
- g) Century Systems The Cleaner 14 Day Men's Formula 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 April 4, 2011, 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

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 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, **Richard Drury** 

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Century Systems, Inc. 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 Century Systems, Inc.

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: April 4, 2014

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 April 4, 2014, 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 Century Systems, Inc. PO Box 43725 Atlanta, GA 30336

Current CEO or President Century Systems, Inc. 120 Selig Drive SW Atlanta, GA 30336

Nathaniel Bronner Jr. (Century Systems, Inc.'s Registered Agent for Service of Process) 120 Selig Drive SW Atlanta, GA 30336

On April 4, 2014, I electronically served the following documents: NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEO.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REOUIRED 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 April 4, 2014, I served the following documents: NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEO.; 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 April 4, 2014, in Fort Oglethorpe, Georgia.

<u>Man Goodrak</u> Tiffany Capehart

#### Notice of Violations of California Health & Safety Code §25249.5 *et seq.* April 4, 2014 Page 6 <u>Service List</u>

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

District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120

District Attorney, Amador County 708 Court Street Jackson, CA 95642

District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965

District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249

District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932

District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553

District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531

District Attorney, El Dorado County 515 Main Street Placerville, CA 95667

District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721

District Attorney, Glenn County Post Office Box 430 Willows, CA 95988

District Attorney, Humboldt County 825 5th Street 4<sup>th</sup> Floor Eureka, CA 95501

District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243

District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514

District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301

District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230

District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453

District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130 District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012

District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637

District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903

District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338

District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482

District Attorney, Merced County 550 W. Main Street Merced, CA 95340

District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020

District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517

District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902

District Attorney, Napa County 931 Parkway Mall Napa, CA 94559

District Attorney, Nevada County 201 Commercial Street Nevada City, CA 95959

District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701

District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678

District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971

District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501

District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814

District Attorney, San Benito County 419 Fourth Street, 2<sup>nd</sup> Floor Hollister, CA 95023

District Attorney,San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004 District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101

District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francsico, CA 94103

District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202

District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408

District Attorney, San Mateo County 400 County Ctr., 3<sup>rd</sup> Floor Redwood City, CA 94063

District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101

District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110

District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060

District Attorney, Shasta County 1355 West Street Redding, CA 96001

District Attorney, Sierra County PO Box 457 Downieville, CA 95936

District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097

District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533

District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403

District Attorney, Stanislaus County 832 12<sup>th</sup> Street, Ste 300 Modesto, CA 95354

District Attorney, Sutter County 446 Second Street Yuba City, CA 95991

District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080

District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093

District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291 District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370

District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009

District Attorney, Yolo County 301 2<sup>nd</sup> Street Woodland, CA 95695

District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901

Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012

San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101

San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102

San Jose City Attorney's Office 200 East Santa Clara Street, 16<sup>th</sup> Floor San Jose, CA 95113