

ENDORSED
FILED
ALAMEDA COUNTY

JUN 18 2014

CLERK OF THE SUPERIOR COURT

By PSwartz Deputy

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6 Attorneys for Plaintiff
7 ENVIRONMENTAL RESEARCH CENTER

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

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13 ENVIRONMENTAL RESEARCH CENTER,)
a non-profit California corporation,)
14 Plaintiff,)
15 v.)
16 PROGRESSIVE LABORATORIES, INC., a)
17 Texas Corporation;)
18 Defendant.)

Case No. **RG14729617**

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

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

19 Plaintiff ENVIRONMENTAL RESEARCH CENTER (“Plaintiff” or “ERC”) brings
20 this action in the interests of the general public and, on information and belief, hereby alleges:

21 **INTRODUCTION**

22 1. This action seeks to remedy the continuing failure of Defendant
23 PROGRESSIVE LABORATORIES, INC., a Texas Corporation (“Progressive” or
24 “Defendant”) to warn consumers in California that they are being exposed to lead and/or lead
25 compounds, substances known to the State of California to cause cancer, birth defects and
26 other reproductive harm. Defendant manufactures, packages, distributes, markets, and/or sells

1 in California the following products containing lead and/or lead compounds (the
2 “PRODUCTS”):

- 3 • **Progressive Laboratories Inc. Legs On Edge**
- 4 • **Progressive Laboratories Inc. Prosta Glan**
- 5 • **Progressive Laboratories Inc. Aller-7**
- 6 • **Progressive Laboratories Inc. Cardio Flow**
- 7 • **Progressive Laboratories Inc. Colon Cleanse**
- 8 • **Progressive Laboratories Inc. One Step**
- 9 • **Progressive Laboratories Inc. Skip-A-Meal Vanilla Shake**
- 10 • **Attogram Corp. Psyllium Powder**
- 11 • **Progressive Laboratories Inc. Ginger Herb Complex**
- 12 • **Progressive Laboratories Inc. Herbal Harmony**
- 13 • **Progressive Laboratories Inc. Daily Greens**
- 14 • **Progressive Laboratories Inc. One Step Chocolate Flavor**
- 15 • **Attogram Corp. Bentonite Magma**
- 16 • **Progressive Laboratories Inc. Cardio Clear**
- 17 • **Progressive Laboratories Inc. Brilliant Vision with Seanol-P**
- 18 • **Progressive Laboratories Inc. Poligugul Complex**
- 19 • **Progressive Laboratories Inc. One Step Strawberry Flavor**
- 20 • **Progressive Laboratories Inc. One Step Vanilla Flavor**
- 21 • **Progressive Laboratories Inc. Skip-A-Meal Chocolate Shake**
- 22 • **Progressive Laboratories Inc. Skip-A-Meal Strawberry Shake**

23 2. Lead and lead compounds (hereinafter, the “LISTED CHEMICALS”) are
24 substances known to the State¹ of California to cause cancer, birth defects, and other
25 reproductive harm.

26 3. The use and/or handling of the PRODUCTS causes exposures to the LISTED
CHEMICALS at levels requiring a “clear and reasonable warning” under California’s Safe
Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”) §
25249.5, *et seq.* (“Proposition 65”). Defendant has failed to provide the health hazard
warnings required by Proposition 65.

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

1 otherwise intentionally availing themselves of the California market through the distribution
2 and sale of the PRODUCTS in the State of California, to render the exercise of jurisdiction
3 over it by the California courts consistent with traditional notions of fair play and substantial
4 justice.

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

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

- 17 a. Defendant was provided a copy of the Notice by Certified Mail.
- 18 b. Defendant was provided a copy of a document entitled "The Safe Drinking Water
19 and Toxic Enforcement Act of 1986 (Proposition 65): A Summary," which is also
20 known as Appendix A to Title 27 of CCR § 25903.
- 21 c. The California Attorney General was provided a copy of the Notice via online
22 submission.
- 23 d. The California Attorney General was provided with a Certificate of Merit by the
24 attorney for the noticing party, stating that there is a reasonable and meritorious case
25 for this action, and attaching factual information sufficient to establish a basis for the
26 certificate, including the identity of the persons consulted with and relied on by the

1 certifier, and the facts, studies, or other data reviewed by those persons, pursuant to
2 H&S Code § 25249.7(h) (2).

3 11. At least 60 days have lapsed since Plaintiff sent the Notice to Defendant. The
4 appropriate public enforcement agencies have failed to commence and diligently prosecute a
5 cause of action under H&S Code § 25249.5, et seq. against Defendant based on the allegations
6 herein.

7 **PARTIES**

8 12. Plaintiff Environmental Research Center (“Plaintiff” or “ERC”) is a
9 corporation organized under the State of California’s Corporations Law. ERC is dedicated to,
10 among other causes, reducing the use and misuse of hazardous and toxic substances, consumer
11 protection, worker safety and corporate responsibility.

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

14 14. Defendant PROGRESSIVE LABORATORIES, INC. (“Progressive” or
15 “Defendant”) is a corporation organized under the State of Texas’ Corporations Law and
16 is a person doing business within the meaning of H&S Code § 25249.11.

17 15. Defendant manufactures, packages, distributes, markets, and/or sells the
18 PRODUCTS for sale or use in California and in Alameda County.

19 **STATUTORY BACKGROUND**

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

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

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

1 expose any individual to a chemical known to the state to cause cancer or
2 reproductive toxicity without first giving clear and reasonable warning to such
individual....

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

8 19. "'Knowingly' refers only to knowledge of the fact that a discharge of, release of,
9 or exposure to a chemical listed pursuant to Section 25249.8(a) of the Act is occurring. No
10 knowledge that the discharge, release or exposure is unlawful is required." 27 CCR § 25102(n).

11 FACTUAL BACKGROUND

12 20. On February 27, 1987, the State of California officially listed the chemical lead
13 as a chemical known to cause reproductive toxicity. Lead became subject to the warning
14 requirement one year later and was therefore subject to the "clear and reasonable" warning
15 requirements of Proposition 65 beginning on February 27, 1988. 27 California Code of
16 Regulations ("CCR") §25000, *et seq.*; H&S Code § 25249.5, *et seq.* Due to the high toxicity
17 of lead, the maximum allowable dose level for lead is 0.5 ug/day (micrograms a day) for
18 reproductive toxicity. 27 CCR § 25805(b).

19 21. On October 1, 1992, the State of California officially listed the chemicals lead
20 and lead compounds as chemicals known to cause cancer. Lead and lead compounds became
21 subject to the warning requirement one year later and were therefore subject to the "clear and
22 reasonable" warning requirements of Proposition 65 beginning on October 1, 1993. 27 CCR §
23 25000, *et seq.*; H&S Code § 25249.6, *et seq.* Due to the carcinogenicity of lead, the no
24 significant risk level for lead is 15 ug/day (micrograms a day). 27 CCR § 25705(b)(1).

25 22. To test Defendant's PRODUCTS for lead, Plaintiff hired a well-respected and
26 accredited testing laboratory that designed the testing protocol used and approved by the

1 California Attorney General years ago for testing heavy metals. The results of testing
2 undertaken by Plaintiff of Defendant's PRODUCTS show that the PRODUCTS tested were in
3 violation of the 0.5 ug/day "safe harbor" daily dose limit set forth in Proposition 65's
4 regulations. The results of testing undertaken by Plaintiff of the following PRODUCTS show
5 that PRODUCTS were also in violation of the 15 ug/day "safe harbor" no significant risk level
6 set forth in Proposition 65's regulations for chemicals listed as carcinogens:

- 7 • **Progressive Laboratories Inc. One Step**
- 8 • **Progressive Laboratories Inc. One Step Chocolate Flavor**
- 9 • **Attogram Corp. Bentonite Magma**
- 10 • **Progressive Laboratories Inc. One Step Strawberry Flavor**
- 11 • **Progressive Laboratories Inc. One Step Vanilla Flavor**

12 23. Of particular significance is the fact that people are being exposed to lead
13 through ingestion of Defendant's PRODUCTS as opposed to other, less harmful methods of
14 exposure, such as dermal exposure. Ingestion of lead produces much higher exposure levels
15 and health risks than does dermal exposure to this chemical.

16 24. At all times relevant to this action, Defendant, therefore, has knowingly and
17 intentionally exposed the users and/or handlers of the PRODUCTS to the LISTED
18 CHEMICALS without first giving a clear and reasonable warning to such individuals.

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

22 26. On April 4, 2014, ERC served Defendant and each of the appropriate public
23 enforcement agencies with a document entitled "Notice of Violations of California Health &
24 Safety Code Section 25249.5 *et seq.*" that provided Defendant and the public enforcement
25 agencies with notice that Defendant was in violation of Proposition 65 for failing to warn
26 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**).

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

5 B. An injunctive order, pursuant to H&S Code § 25249.7(b), compelling
6 Defendant to identify and locate each individual who has purchased the PRODUCTS since
7 April 4, 2011, and to provide a warning to such person that the use of the PRODUCTS will
8 expose the user to chemicals known to cause cancer, birth defects, and other reproductive
9 harm.

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

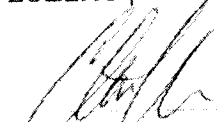
12 D. An award to Plaintiff of its reasonable attorneys fees and costs of suit pursuant
13 to California Code of Civil Procedure § 1021.5, as Plaintiff shall specify in further application
14 to the Court; and,

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

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DATED: June 18, 2014

LOZEAU | DRURY LLP



Richard T. Drury
Christina M. Caro
Attorneys for Plaintiff
Environmental Research Center

Exhibit A

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T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

VIA CERTIFIED MAIL

Current CEO or President
Progressive Laboratories, Inc.
1701 W Walnut Hill Lane
Irving, TX 75038

Joseph Oneal
(Progressive Laboratories, Inc.'s
Registered Agent for Service of Process)
1701 W Walnut Hill Lane
Irving, TX 75038

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:

Progressive Laboratories, Inc.

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

1. **Progressive Laboratories Inc. Legs On Edge - Lead**
2. **Progressive Laboratories Inc. Prosta Glan - Lead**
3. **Progressive Laboratories Inc. Aller-7 - Lead**
4. **Progressive Laboratories Inc. Cardio Flow - Lead**
5. **Progressive Laboratories Inc. Colon Cleanse - Lead**
6. **Progressive Laboratories Inc. One Step - Lead**
7. **Progressive Laboratories Inc. Skip-A-Meal Vanilla Shake - Lead**
8. **Attogram Corp. Psyllium Powder - Lead**
9. **Progressive Laboratories Inc. Ginger Herb Complex - Lead**
10. **Progressive Laboratories Inc. Herbal Harmony - Lead**
11. **Progressive Laboratories Inc. Daily Greens - Lead**
12. **Progressive Laboratories Inc. One Step Chocolate Flavor - Lead**
13. **Attogram Corp. Bentonite Magma - Lead**
14. **Progressive Laboratories Inc. Cardio Clear - Lead**
15. **Progressive Laboratories Inc. Brilliant Vision with Seanol-P - Lead**
16. **Progressive Laboratories Inc. Poligugul Complex - Lead**
17. **Progressive Laboratories Inc. One Step Strawberry Flavor - Lead**
18. **Progressive Laboratories Inc. One Step Vanilla Flavor - Lead**
19. **Progressive Laboratories Inc. Skip-A-Meal Chocolate Shake - Lead**
20. **Progressive Laboratories Inc. Skip-A-Meal Strawberry Shake - 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

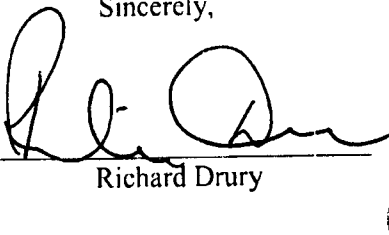
Notice of Violations of California Health & Safety Code §25249.5 *et seq.*
April 4, 2014
Page 3

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 Progressive Laboratories, Inc. and its Registered Agent for Service of Process only)
Additional Supporting Information for Certificate of Merit (to AG only)

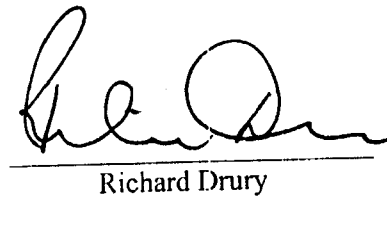
CERTIFICATE OF MERIT

Re: Environmental Research Center's Notice of Proposition 65 Violations by Progressive Laboratories, 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
Progressive Laboratories, Inc.
1701 W Walnut Hill Lane
Irving, TX 75038

Joseph Oneal
(Progressive Laboratories, Inc.'s Registered Agent
for Service of Process)
1701 W Walnut Hill Lane
Irving, TX 75038

On April 4, 2014, I electronically served the following documents: **NOTICE OF VIOLATIONS, 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 April 4, 2014, I served the following documents: **NOTICE OF VIOLATIONS, 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 April 4, 2014, in Fort Oglethorpe, Georgia.



Tiffany Capehart

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

April 4, 2014

Page 6

Service List

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 4th 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
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Bridgeport, CA 93517

District Attorney, Monterey County
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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, 2nd 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 Francisco, 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., 3rd 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 12th 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 2nd 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,
16th Floor
San Jose, CA 95113